

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

ORDER No. R2-2014-0018

RESCISSON OF SITE CLEANUP REQUIREMENTS (ORDER No. R2-2003-0080) for:

**UNITED STATES DEPARTMENT OF DEFENSE, DEPARTMENT OF THE ARMY;
UNITED STATES DEPARTMENT OF THE INTERIOR, NATIONAL PARK SERVICE; and
THE PRESIDIO TRUST**

for the property located at:

**THE PRESIDIO OF SAN FRANCISCO
SAN FRANCISCO, SAN FRANCISCO COUNTY**

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter the Regional Water Board), finds that:

1. **Site Description and History:** For 150 years until 1994, the Presidio of San Francisco (herein, the Presidio) was a Department of the Army (Army) installation and served as a mobilization and departure point during several overseas conflicts, a medical debarkation center, and the coastal defense for the San Francisco Bay Area. Industrial operations formerly performed at the Presidio were associated with the military's maintenance and repair of vehicles, aircraft, and base facilities. The Presidio also contains former landfills used by the Army for the disposal of fill soils and construction debris. In 1994, the Presidio was transferred to the National Park Service (NPS) and became part of the Golden Gate National Recreation Area. In 1996, Congress established the Presidio Trust (Trust), a federal government corporation responsible for managing the inland areas of the Presidio and converting it to a financially self-sufficient national park site.
2. **Summary of Investigation and Remediation Activities:** The primary contaminants at the Presidio are total petroleum hydrocarbons (TPH, including gasoline, diesel, fuel oil, and motor oil), gasoline constituents (benzene, toluene, ethylbenzene, and total xylenes or BTEX), petroleum solvents (Stoddard solvent), fuel oxygenates (methyl tertiary butyl ether or MTBE), and polycyclic aromatic hydrocarbons (PAHs). Site investigations to delineate the nature and extent of contamination included borehole drilling, soil and groundwater collection and analysis, passive soil gas surveys, installation of monitoring wells and groundwater sampling, geophysical surveys, and excavation of test pits. Based on site investigation activities, contaminant releases at the Presidio were due to past surface spills, former aboveground storage tanks (ASTs), underground storage tanks (USTs), and fuel distribution system (FDS) pipelines.

Approximately 575 tanks and 66 FDS pipeline segments have been removed at the Presidio along with about 100,000 tons of contaminated soil. In addition, remediation has included soil vapor extraction, groundwater extraction, in-situ bioremediation, thermal remediation, and natural attenuation.

3. **Regulatory History:** The Regional Water Board adopted revised site cleanup requirements for the Presidio on August 20, 2003 (Order No. R2-2003-0080). The purpose of the order was to update prior orders for the Presidio (Order Nos. 91-082 and 96-070) by identifying the current responsible parties (Army, NPS, and Trust); establish a schedule for corrective actions; and rescind the earlier orders.

In addition, Order No. R2-2003-0080 established cleanup standards based on the current and planned future uses for the Presidio for TPH, PAHs, MTBE, and lead. Soil cleanup levels were based on protection of human health (residential, park maintenance, and recreational uses), ecological receptors (terrestrial and aquatic), and water quality. Groundwater cleanup standards were based on protection of freshwater and saltwater ecological receptors and the beneficial use of groundwater as a potential source of drinking water.

4. **Basis for Rescission:** Rescission is appropriate because the tasks identified in Order No. R2-2003-0080 have been completed (Table 1). These tasks represent over 180 individual sites at the Presidio that have been evaluated and closed. All of these sites at the Presidio, with the exception of the Building 637 Area, have met the criteria outlined in the July 2009 assessment tool for closure of low-threat sites as discussed below. Residual contamination in the Building 637 Area is temporarily inaccessible and will be addressed in the future under a separate cost recovery agreement.
 - a. **Pollutant sources are identified and evaluated.** The Presidio's contaminants are TPH, gasoline constituents (BTEX), Stoddard solvent, MTBE, and PAHs. The contamination resulted from surface leaks and spills and releases from USTs, ASTs, and FDS pipeline segments during Army operations.
 - b. **The Presidio is adequately characterized.** The Presidio was characterized through a series of soil and groundwater investigations by the Army and the Trust. Hundreds of soil borings and 113 monitoring wells were installed, and hundreds of excavation confirmation samples were collected and analyzed. Site investigations adequately delineated the lateral and vertical extent of soil and groundwater contamination.
 - c. **Exposure pathways, receptors, and potential risks, threats, and other environmental concerns are identified and assessed.** Site specific exposure pathways have been assessed and nearby receptors have been identified. Based on these evaluations, impacts to surface water, wetlands, or other sensitive receptors are not likely.
 - d. **Pollutant sources are remediated to the extent feasible.** All known USTs and ASTs that are no longer in service have been removed. All known FDS pipeline segments have been removed or capped and abandoned in place. The Presidio's contaminants have been remediated by a combination of soil excavation and offsite disposal, soil vapor extraction, groundwater treatment and extraction, in-situ bioremediation, thermal remediation, and natural attenuation.

- e. **Unacceptable risks to human health, ecological health, and sensitive receptors, considering current and future land and water uses, are mitigated.** Residual soil and groundwater contamination does not pose unacceptable risk to human health or ecological receptors. Residual contamination does not exceed standards based on protection of human health (residential, park maintenance, and recreational uses) and ecological receptors (terrestrial and aquatic).
- f. **Unacceptable threats to groundwater and surface water resources, considering existing and potential beneficial uses, are mitigated.** No water wells, deeper drinking water aquifers, surface water, or other sensitive receptors are likely to be impacted because residual contamination does not exceed standards for protection of drinking water, wetlands, and surface water beneficial uses. The Presidio Trust Management Plan (PTMP), which is the federal facility master plan, states that 80-85% of the Presidio's drinking water comes from Lobos Creek with the remaining 15-20% purchased from the San Francisco Public Utilities Commission. Although shallow groundwater beneath the Presidio is not currently used for drinking water, the Basin Plan identifies the entire basin underlying the Presidio as having potential beneficial use for municipal and domestic water supply.
- g. **Groundwater plumes are decreasing.** All groundwater plumes have been remediated. Approximately 20 years of groundwater monitoring indicate that chemical concentrations do not exceed California maximum contaminant levels (MCLs) for protection of drinking water or other applicable water quality objectives.
- h. **Cleanup standards can be met within a reasonable timeframe.** Soil and groundwater cleanup levels that are protective of public health and environmental resources have been met. Natural attenuation is expected to reduce any lingering contaminant concentrations in soil and shallow groundwater even further.
- i. **Risk management measures are appropriate, documented, and do not require further Regional Water Board oversight.** The Trust prepared the Land Use Control Master Reference Report (LUCMRR), dated September 2009, to serve as the implementation and enforcement plan to ensure that restrictions at the Presidio are maintained to protect public health and the environment. The LUCMRR identifies land use controls, such as restrictions on sensitive uses, the use of shallow groundwater, and requirements such as the implementation of a soil management plan that addresses appropriate health and safety measures in the event that subsurface activities are performed. Any change in the PTMP, such as the development of a groundwater supply, would require formal review under the National Environmental Policy Act. Further, the Trust would need to obtain a permit or modify its existing permit with the California Department of Public Health. These existing restrictions ensure that groundwater will not be used for drinking water without appropriate regulatory review and approval.

In addition, the Trust developed a Petroleum Contingency Plan that establishes a process for reporting, investigating, and remediating previously unknown tanks or soil impacted with petroleum or related constituents that may be encountered as part of construction, maintenance, or other subsurface operations at the Presidio.

5. **CEQA:** This action rescinds an Order to enforce the laws and regulations administered by the Regional Water Board. Rescission of the Order is not a project as defined in the California Environmental Quality Act (CEQA). There is no possibility that the activity in question may have a significant effect on the environment. (Cal. Code Regs., tit. 14 §§ 15378 and 15061, subd. (b) (3).)
6. **Notification:** The Regional Water Board has notified the dischargers and all interested agencies and persons of its intent under California Water Code section 13304 to rescind site cleanup requirements for the discharge and has provided them with an opportunity to submit their written comments.
7. **Public Hearing:** The Regional Water Board, at a public meeting, heard and considered all comments pertaining to this discharge.

IT IS HEREBY ORDERED, pursuant to section 13304 of the Water Code, that Order No. R2-2003-0080 is rescinded.

I, Bruce H. Wolfe, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on May 14, 2014.

Bruce H. Wolfe
Executive Officer

Table 1. Summary of Completed Tasks from Board Order No. R2-2003-0080

Task in Order	Documentation of Compliance	Completion Date
1. Comprehensive petroleum investigation and remediation time schedule	<i>Comprehensive Petroleum Investigation and Remediation Time Schedule</i>	Nov. 21, 2003
	<i>Updated Comprehensive Petroleum Investigation and Remediation Time Schedule</i>	January 2008
2. Workplan for development of freshwater corridor surface water and sediment point of compliance concentrations	<i>Development of Freshwater TPH-diesel and TPH-fuel oil Point of Compliance Concentrations</i>	July 15, 2004
3. Report documenting the implementation of the freshwater corridor surface water and sediment point of compliance concentrations approach		
4. Interim remedial action work plan for Corrective Action Plan (CAP) sites	<i>Commissary Seeps Interim Source Removal Action Plan</i>	March 2001
	<i>Interim Action Plan, Building 1065 CAP Area</i>	July 2003
	<i>Interim Removal Action Work Plan, Removal of AST, Building 1349</i>	July 1995
5. Completion of interim remedial actions at CAP sites	<i>Interim Remedial Action for Building 231</i>	February 1992
	<i>Commissary Seeps Interim Source Removal Action Report</i>	January 2002
	<i>Completion Report, Phase I Interim Action, Building 1065 CAP Area</i>	July 2004
	<i>AST Closure Report, Building 1349</i>	May 1996
6. Proposed final CAP and cleanup standards at CAP sites	<i>Final Corrective Action Plan, Building 207/231 Area</i>	October 2007
	<i>Final Corrective Action Plan, Commissary/PX Study Area</i>	December 2005
	<i>Final Corrective Action Plan, Building 1065 Area</i>	January 2007
	<i>Final Corrective Action Plan for Building 1349 Study Area</i>	February 2006
	<i>Final Corrective Action Plan, Building 637 Area</i>	August 1999
7. Summary report and work plan for Mini-CAP sites	<i>Summary Additional Investigations, Mini-CAP Sites</i>	February 2003
	<i>Mini-CAP Site Review and Recommendations to Address Former Petroleum Tank Release Sites</i>	March 2004
	<i>Draft Final Site Investigation Work Plan Tank 1451.1, Mini-CAP Site</i>	May 2005

Table 1 (continued). Summary of Completed Tasks from Board Order No. R2-2003-0080

8. Completion of site investigation and remediation work plan at Mini-CAP sites	<i>Site Investigation Report, Tank 1451.1, Mini-CAP Site</i>	October 2005
	<i>Field Sampling Plan for Former Building 970</i>	May 2007
	<i>Mini-CAP Additional Investigations, Excavation, and Groundwater Monitoring Well Installations to Address Former Petroleum Release Site</i>	May 2007
9. Completion of final remedial actions at Mini-CAP sites	<i>Submittal of Information for Identified Geotracker Sites and Closure Request for Selected Tanks</i>	April 2009
	<i>Field Investigation Report and Closure Request for Former AST 970/Building 971 Area</i>	May 2011
10. Site status reports	<i>Site Status Report #1</i>	January 2004 (submitted semi-annually thereafter until 2008)
	<i>Presidio Trust Remediation Program Quarterly Program Status Report</i>	September 2008 (submitted quarterly thereafter)
11. Site-wide groundwater/surface water semi-annual monitoring reports	<i>Semi-Annual Groundwater Monitoring Report, First and Second Quarters 2003</i>	October 2003 (submitted semi-annually thereafter)
12. Underground storage tank, aboveground storage tank, and fuel delivery system closure certification	Please refer to Tables 5a, 5b, 8, and 9 of the <i>Report Supporting Rescission of Water Board Order R2-2003-0080</i> dated May 2014	See Documentation of Compliance
13. Five-year status report	<i>Evaluation of Post-Remediation Groundwater Monitoring Results, Building 207/231 Area</i>	February 2014
	<i>Construction Completion Report, Building 207/231 Area</i>	January 2014
	<i>Correction Action Plan Implementation and Closure Report, Commissary PX Study Area</i>	November 2008
	<i>Revised Closure Request, Bldg. 1065 Area</i>	April 2011
	<i>Construction Completion Report, CAP Implementation, Bldg. 1065 Area</i>	March 2009
	<i>Groundwater Assessment and Request to Terminate Groundwater Monitoring of Well 1349MW100, CAP Area,</i>	October 2012

Table 1 (continued). Summary of Completed Tasks from Board Order No. R2-2003-0080

	<i>Building 1349</i>	
	<i>Corrective Action Implementation Report for the Bldg. 1349 Study Area</i>	March 2011
	<i>Building 637 Area Corrective Action Implementation Report</i>	February 2014
	<i>Bldg. 637 Area Completion Report</i>	March 2004
14. Low temperature thermal desorption (LTTD) soil tracking and management	<i>Low Temperature Thermal Desorption-Treated Soil Tracking and Management Plan</i>	November 2004
15. Lead cleanup value proposal	<i>Presidio-Wide Cleanup Levels for Soil, Sediment, Groundwater, and Surface Water</i>	October 2002
16. Contingency petroleum sites	<i>Petroleum Contingency Plan</i>	August 2004
17. Delayed compliance	<i>Request for Time Extension for Task on Presidio Petroleum Schedule, Site Cleanup Requirements</i>	December 2003
	<i>Request for Time Extension for Task on Presidio Petroleum Schedule, Bldg. 1065 Phase II Interim Action</i>	March 2004
	<i>Request for Time Extension for Task on Presidio Petroleum Schedule, Draft Commissary PX Corrective Action Plan</i>	April 2004
	<i>Request for Time Extension: Presidio Petroleum Schedule, Draft Bldg. 1349 Area Corrective Action Plan</i>	January 2005
	<i>Request for Time Extension on Construction Start Date, Commissary PX Site</i>	August 2005



Presidio
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May 9, 2014

Ms. Agnes Farres
California Regional Water Quality Control Board, San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subject: Transmittal of Report Supporting Rescission of Water Board
Order R2-2003-0080
Presidio of San Francisco, California

Dear Ms. Farres:

Attached is the final *Report Supporting Rescission of Water Board Order R2-2003-0080, Presidio of San Francisco, California*. This report documents Presidio Trust (Trust) compliance with the requirements of Order R2-2003-0080 (Order) and references key reports and Water Board approvals that demonstrate corrective actions for sites listed in the Order are complete. Based on the corrective actions implemented, the Trust requests the Water Board rescind the Order.

Completing the work under the Order was a significant task that could not have been accomplished without the continued support of Water Board staff. I especially thank you and your supervisor, Alec Naugle, for your dedication in working with the Trust to ensure that this complex cleanup was completed in a timely fashion and, more importantly, to a standard reflective of the Presidio's continued use as a national park and public asset.

Please contact me at (415) 561-4259 or John DeWitt at (650) 292-9100 if you have questions or comments on the attached. Thank you for your support on this project.

Sincerely,

A handwritten signature in blue ink that reads "Eileen Fanelli".

Eileen Fanelli
Environmental Remediation Program Manager

cc. John DeWitt, EKI
Brian Ullensvang, NPS
Bruce Handel, USCOE

**REPORT SUPPORTING RESCISSION OF
WATER BOARD ORDER R2-2003-0080**

**PRESIDIO TRUST, DEPARTMENT OF THE INTERIOR NATIONAL PARK SERVICE,
DEPARTMENT OF DEFENSE DEPARTMENT OF THE ARMY, AND CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY CALIFORNIA REGIONAL WATER QUALITY
CONTROL BOARD, SAN FRANCISCO BAY REGION**

PRESIDIO OF SAN FRANCISCO, CALIFORNIA

Prepared for:

The Presidio Trust

67 Martinez Street

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Prepared by:

Erler & Kalinowski, Inc.

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May 2014

EKI B00025.04



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9 May 2014

Ms. Eileen Fanelli
Presidio Trust
67 Martinez Street
Post Office Box 29052
San Francisco, California 94129-0052

Subject: Report Supporting Rescission of the Water Board Order
Presidio Trust, San Francisco, California
(EKI B00025.04 T 10)

Dear Ms. Fanelli:

Erler & Kalinowski, Inc. ("EKI") is pleased to present this Report Supporting Rescission of Water Board Order R2-2003-0080 documenting the Presidio Trust's compliance with the Water Board Order.

If you have any questions please do not hesitate to call.

Very truly yours,

ERLER & KALINOWSKI, INC.



John DeWitt, P.E.
Project Manager



**REPORT SUPPORTING RESCISSION OF
WATER BOARD ORDER R2-2003-0080**

**PRESIDIO TRUST, DEPARTMENT OF THE INTERIOR NATIONAL PARK SERVICE,
DEPARTMENT OF DEFENSE DEPARTMENT OF THE ARMY, AND CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY CALIFORNIA REGIONAL WATER QUALITY
CONTROL BOARD, SAN FRANCISCO BAY REGION**

PRESIDIO OF SAN FRANCISCO, CALIFORNIA

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- 1 Corrective Action Plan, FDS Section, and Tank Site Locations

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**REPORT SUPPORTING RESCISSION OF
WATER BOARD ORDER R2-2003-0080**

**PRESIDIO TRUST, DEPARTMENT OF THE INTERIOR NATIONAL PARK SERVICE,
DEPARTMENT OF DEFENSE DEPARTMENT OF THE ARMY, AND CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY CALIFORNIA REGIONAL WATER QUALITY
CONTROL BOARD, SAN FRANCISCO BAY REGION
PRESIDIO OF SAN FRANCISCO, CALIFORNIA**

EXECUTIVE SUMMARY

The purpose and scope of this Report Supporting Order Rescission (Report) is to demonstrate that the Presidio Trust's Remediation Department at the Presidio of San Francisco (Presidio) Petroleum Program has complied with, and completed the elements of, the Regional Water Quality Control Board (Water Board) Order R2-2003-0080 (Order). This Report has been prepared in response to an October 21, 2013 e-mail from the Water Board requesting a report documenting the Presidio Trust's compliance with the Order.

The Order outlines general and specific requirements for the cleanup of enumerated sites within the Presidio that include; Corrective Action Plan (CAP) sites, mini-CAP sites, Fuel Distribution System (FDS) sites, and above and below ground petroleum storage tanks (AST and UST) sites. The Order further specified tasks required to be completed as part of site cleanup.

Based on the work completed to date, the Water Board has determined that the sites listed in the Order have met the criteria for site closure or No Further Action (NFA) as follows:

Site Type	Number of Sites	Number of Sites Closed
Corrective Action Plan (CAP)	5	4 ¹
Mini-CAP	27	27
Fuel Distribution System (FDS)	66	46
Tanks	476	476

¹ Although closed by the Water Board in 2008, additional removal of impacted soil at the Building 637 Area site was completed in 2013. Residual impacted soil remains in an inaccessible area. The residual soil will be addressed in the future under a voluntary cleanup agreement when the soil is accessible after the Doyle Drive construction project is complete.

Based on the compliance assessment presented herein, the Trust requests that the Water Board rescind the Order.

For additional sites that are not listed in the Order, the Army will retain overall financial responsibility as outlined in the Memorandum of Agreement (MOA) between the Army, the Trust, and the National Park Service (NPS) (Army, Trust, NPS, 1999). Pursuant to the MOA, the Trust or Army will implement approved corrective actions, with Water Board oversight under the existing *Petroleum Contingency Plan* (Erler & Kalinowski, Inc., 2004a), a voluntary cleanup agreement, or a site-specific agreement.

1.0 INTRODUCTION

1.1 Purpose and Scope of Work

This report, titled Report Supporting Order Rescission of Water Board Order R2-20003-0080 (Report) was prepared by Erler & Kalinowski, Inc. (EKI) on behalf of the Presidio Trust (Trust) in response to an October 21, 2013 e-mail from the Water Board. The Report describes activities and response actions performed at the Presidio of San Francisco, California (Presidio; Figure 1) in accordance with the Regional Water Quality Control Board (Water Board) Order R2-2003-0080 (Order).

The purpose of this Report is to demonstrate that the Presidio Trust's Remediation Department, has complied with the requirements of the Order through the response actions implemented at each of the sites listed in the Order. This Report summarizes the Trust's fulfillment of the tasks outlined in the Order, and describes and lists the key reports documenting the site-specific assessment, remediation, and closure activities that the Trust has conducted in compliance with the Order.

1.2 Report Organization

This Report presents a brief overview of the Order and the work that has been completed to date at specific sites in response to the Order.

Section 2.0 provides background information and summarizes the Order requirements.

Section 3.0 describes how the Trust has complied with the Order, including information on the site-specific response actions and development of a *Petroleum Contingency Plan* (EKI, 2004a).

Section 4.0 describes the Operations and Maintenance Agreement and the *Operations and Maintenance Agreement Plan* (Trust, 2012) that continues to guide the Trust's actions related to the annual inspection and reporting on sites with post-remediation groundwater monitoring and Land Use Control (LUC) requirements.

Section 5.0 presents conclusions and recommendations regarding rescission of the Order and on-going Water Board oversight at the Presidio.

Table 1 presents a listing of the tasks in the Order, the date of task completion, and how completion of the task is documented in this Report. Tables 2 through 11 and Appendix A provide additional detail regarding the Corrective Action Plan (CAP) and sites named in the Order, the investigations and remediation actions completed to date, and the site closure status. Appendix B includes the Remediation Program Schedule. Appendix C includes a listing of references for the reports prepared by the Trust in response to the Order and the approval letters and other correspondence received from the Water Board.

2.0 BACKGROUND AND ORDER REQUIREMENTS

2.1 Background

2.1.1 Site Location and History

The Presidio occupies approximately 1,491 acres at the northern end of the San Francisco peninsula and is located within the limits of the City and County of San Francisco. San Francisco Bay bounds the Presidio to the north, the Pacific Ocean lies to the west, and residential neighborhoods are located to the south and east (Figure 1).

The Presidio was originally established in 1776 as a Spanish military garrison and then was occupied by Mexico from 1822 to 1835. It was briefly used as a garrison by American colonists in 1847 and then was operated as military post by the Army from 1848 through 1994. During this time, the Presidio served as a mobilization and embarkation point during several overseas conflicts, was used as a medical debarkation center, and provided coastal defense facilities for the San Francisco Bay area. Although there were no reported heavy industrial operations at the Presidio, light industrial operations included vehicle and aircraft maintenance and repair, fuel storage and distribution, medical and laboratory facility operations, weapons operations, printing and painting, and dry cleaning. These and other historical activities at the Presidio stored and used hazardous materials and generated hazardous wastes (including waste solvents, paints, batteries, and corrosive liquids) and other miscellaneous wastes (including medical wastes and waste oil products). These operations are the source of waste releases identified in the Order.

The Presidio was recommended for closure by the United States' Secretary of Defense's Commission on Base Realignment and Closure (BRAC) in December 1988. The Army was responsible for the cleanup of any waste release from its operations. With regard to petroleum releases, the Water Board had Site Cleanup Requirements to the Army for the Presidio of San Francisco in 1991 (Order 91-082) and 1996 (Order 96-070) that detailed the regulatory requirements for petroleum-related sites within the Presidio.

In 1994, under Public Law 92-589, land management responsibility for the Presidio was transferred to the NPS and the Presidio became part of the Golden Gate National Recreational Area (GGNRA). As required by the BRAC Act, the Army continued to performed environmental studies at the Presidio as part of the property transfer process.

In 1996, the Trust was established as a Federal government corporation with the purpose of managing the leasing, maintenance, rehabilitation, and improvement of the non-coastal portions of the Presidio (designated “Area B”) under Section 103 of the Omnibus Parks and Public Lands Management Act of 1996, Public Law 104-33, 110 Stat. 4097 (Trust Act). The NPS retained management responsibility for the coastal portions of the Presidio (Area A). Areas A and B of the Presidio are depicted on Figure 1. The Army continued to be responsible for environmental remediation in both Areas A and B.

On May 24, 1999, the Army, the Trust, and the NPS entered into a MOA (Army, Trust and NPS, 1999). Pursuant to the MOA, the Army delegated its authority for remediation of the Presidio to the Trust (both Areas A and B). The Army retained responsibility for potential impacts related to unexploded ordnance; nuclear, biological, and chemical weapons or agents; offshore areas; and other unknown contamination as defined in the MOA.

On May 24, 1999, the Trust and NPS also signed the Area A Memorandum of Agreement (Area A MOA; Trust and NPS, 1999), which outlined the relationship between the NPS and Trust during remediation of sites in Area A.

In August 1999, the Trust and NPS entered into a Consent Agreement with the Department of Toxic Substances Control (DTSC) that established requirements and procedures for cleanup of releases of hazardous substances and hazardous waste at the Presidio consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Resource Conservation and Recovery Act (RCRA) (DTSC, Trust, and NPS, 1999). The CERCLA site investigation and cleanup activities are overseen by the DTSC, and are not covered in this report, but are summarized under separate cover (AMEC, 2014).

In 2003, the Water Board issued a revised Order and rescinded the prior orders (Water Board, 2003). This report focuses completion of tasks associated with the current Order.

2.1.2 Responsible Parties

The Order was issued to the Army, the Trust, and the NPS in August 2003, all of whom are named dischargers pursuant to the Order. The Army is named based on the substantial evidence that pollutants were discharged during the course of its operations at the Presidio. The NPS and Presidio Trust were named because of their administrative responsibility for Areas A and B of the Presidio, respectively.

2.1.3 Primary Planning Documents

In 1999 when the Trust took on responsibility for the cleanup of the Presidio, it did so with the intent of insuring the cleanup would be consistent with future land use goals and objectives and reflective of the Trust’s mission to preserve the Presidio as an enduring public resource and national park. Additionally, in 1963, the Presidio was designated a registered national historic landmark, and in 1966 the installation was listed on the National Register of Historic Places. These resources needed to be protected during the remedial process.

The key land use plans include the 1994 General Management Plan Amendment (GMPA; NPS, 1994) that provided guidelines for the management and improvement of the Presidio. This planning document is still applicable to Area A of the Presidio. In 2002, the Trust prepared the Presidio Trust Management Plan (PTMP; Trust, 2002a) which sets forth the Trust's land use policies and the general management framework for Area B of the Presidio. The Trust manages Area B of the Presidio in accordance with the PTMP, the general objectives of the GMPA, which are set forth in Trust Board Resolution 99-11, and in such a way as to protect the Presidio from development and uses that would destroy the scenic beauty, historic and natural characteristics of the area, and cultural and recreational resources. The Trust and NPS also jointly developed the Vegetation Management Plan and Environmental Assessment (VMP; NPS and Trust, 2001) to guide the management and restoration of natural resources at the Presidio.

These three documents serve as land use Master Plans and provide the framework for understanding current and future land uses in the Presidio. In conjunction with the Order and the Consent Agreement, the PTMP, GMPA, and VMP have been used to develop strategies to effectively remediate and protect, preserve, and restore the Presidio's cultural and biological resources, and to enhance the overall health of the Presidio and the public's experience at the site.

2.2 Order Overview

The Order includes a comprehensive background section that, through a series of 21 findings, describes the location and history of the Presidio, the location and extent of investigations conducted at the CERCLA and petroleum sites, provides a basis for the cleanup standards, outlines a cleanup plan, and outlines various cost-recovery, notifications, and public hearing requirements.

As stated in Finding 9 of the Order, prior to the establishment of the Trust, the Army completed or partially conducted several remedial investigations at the Presidio for both CERCLA and petroleum sites.

For the CERCLA sites, the Army conducted remedial investigations in the Public Health Services Hospital Area, the Main Installation Operable Unit Area (including the Crissy Field Area and the Directorate of Engineering and Housing Unit Area), Building 937, and the Firing Range Operable Unit. Information regarding the specific activities performed at these sites by the Army and the Trust is available in the site-specific investigation and completion reports and summarized in the Trust's report documenting completion of the DTSC Consent Agreement (AMEC, 2014).

With respect to the Petroleum Program sites which are the subject of the Order and this Report, the Army conducted initial remedial investigation and removal activities at the Building 207/231 Area, the Building 1065 Area, and the Fuel Distribution System (FDS) piping, as well as at many underground and aboveground storage tanks (USTs and ASTs). In addition, the Army installed numerous groundwater monitoring wells throughout the Presidio and conducted groundwater

monitoring. These data were relied on by the Trust in completing further corrective action in compliance with the Order.

Residual petroleum-related impacts to soil and groundwater identified at the Building 207/231 Area, Building 1065 Area, the Commissary/PX Area, Building 1349, and the Building 637/638 Area were identified in the order as CAP sites. The locations of these CAP sites are shown on Figure 1. Chemical impacts at these sites included a range of total petroleum hydrocarbons as gasoline (TPHg), diesel (TPHd), and fuel oil (TPHfo). A summary of the petroleum-related impacts encountered in soil and groundwater at each CAP site, as described in the Order, are presented below:

CAP Site	Soil Impacts	Groundwater Impacts
Building 207/231	“hydrocarbon-impacted soil”	TPHg, TPHd, Benzene, Toluene, Ethylbenzene, Total Xylenes, 1,2-Dichloroethane
Commissary/PX	TPHg, TPHd	TPHg, Ethylbenzene, Total Xylenes
Building 1065 Area	Information not included in Order	TPHg, TPHd, Benzene, Toluene, Ethylbenzene, Total Xylenes, 1,2-Dichloroethane
Building 1349	TPHd, TPH-unknown, TPHfo	TPHg, TPHd, Benzene
Building 637/638	“hydrocarbon-impacted soil”	TPHg, Benzene, Toluene, Ethylbenzene, Total Xylenes, Methyl Tertiary Butyl Ether (MTBE)

In addition to the above CAP sites, the Order identified a number of tank sites where the only impacts were related to fuel products, and where groundwater quality at the site had not been impacted. These sites were designated as mini-CAP sites and were managed through a streamlined reporting and approval process. The 27 mini-CAP sites include:

Mini-CAP Sites			
UST-3	UST-42	UST-100.1	UST-101.1
UST-101.2	UST-102.1	UST-102.2	UST-103.1
UST-104.1	UST-104.2	UST-334	UST-338.1
UST-339	UST-342	UST-343	UST-514.1
UST-651	UST-951	UST-1030	UST-1213
UST-1221.1	UST-1221.2	UST-1221.3	UST-1221.4
UST-1260	UST-1451	Building 970/971	

There were an estimated 575 known or suspected ASTs and USTs associated with former Army operations at the Presidio. Approximately 476 contained petroleum hydrocarbons or were unsubstantiated and were therefore remediated or otherwise addressed under the oversight of the Water Board, see Tables 5a and 5b. Of the remaining tanks that contained waste oils or other substances, nine (9) were addressed under oversight of the DTSC², and 91 were addressed by the City and County of San Francisco (CCSF). Many of the tank sites associated with building heating systems were fed by a fuel distribution system (FDS). The FDS included approximately 45,000 feet of main pipeline and additional length of laterals feeding individual tanks and boilers.

The Army removed the majority of the former ASTs and USTs and FDS segments. The Army thermally treated approximately 17,000 tons of petroleum-impacted soil excavated from various tank and pipeline sites to meet specific remedial goals in an onsite, low temperature thermal desorption (LTTD) unit so that the soil would be suitable for reuse at the Presidio as backfill at the remediation sites. The Water Board Order No. 96-070 presented the operational objectives, requirements, and monitoring program for the LTTD process. Management of LTTD-treated soil became a Trust responsibility, and the current Order addresses this legacy material by requiring a *LTTD Treated Soil Management Plan* (EKI, 2004b; see Table 1).

2.3 Order Requirements

The Order outlines the cleanup requirements in four main sections; Section A: Prohibitions, Section B: Cleanup Plan and Standards, Section C: Tasks, and Section D: Provisions.

² This count includes tank 640.2, which was also closed by the Water Board and is included as one of the 476 tanks addressed under Water Board oversight.

Sections A and B are described in more detail below in Sections 2.3.1 through 2.3.7. The bulk of this Report (Section 3.0) describes how the Trust met the requirements of Section C: Tasks.

2.3.1 Prohibitions

Section A of the Order identifies six prohibitions for actions at the Presidio to protect water quality. These include:

- The discharge of wastes or hazardous substances in a manner that degrades or adversely affects the beneficial us or quality of the waters of the State;
- The further significant subsurface migration of wastes or hazardous substances through subsurface transport to the waters of the State;
- Investigation or cleanup activities which cause significant adverse migration of wastes or hazardous substances;
- Discharge of LTTD-treated soil within 50 feet of any lake, creek, stream, or spring;
- Backfill of the top 18-inches of any excavation with soil that has detectable concentrations of fuel constituents; and
- Backfill of excavations below 18-inches with soil that does not meet the standards specified in the Order.

The Trust Remediation Department complied with the Order and these prohibitions were not violated during the course of the site investigation and remediation activities. Additional clarification was provided by the Water Board in regards to backfills within 18-inches of the ground surface in relation to remediation of a site under the jurisdiction of DTSC. In that particular case, the Water Board approved use of backfill with detectable, but low concentrations of TPH at the Landfill 10 site in a letter dated August 31, 2009 (Water Board, 2009). Additionally, based on further testing of LTTD soil associated with the Building 207/231 area, the Water Board allowed reuse of LTTD soil at Remedial Unit 207 within 50 feet of a future marsh in a letter dated May 6, 2010 (Water Board, 2010).

2.3.2 Cleanup Plan

Cleanup requirements are outlined in Finding 13 and in Section B of the Order.

Finding 13 specifies the USTs, ASTs, and associated piping to be investigated and remediated as part of CAP and Mini-CAP sites. Specific requirements under Finding 13 are listed below. Reference to tables summarizing Trust compliance is also provided.

1. Develop and adhere to a schedule of petroleum cleanup actions for all leaking tanks and associated piping (see Table 2 for documentation of compliance);

2. Fully investigate, characterize and remediate soil and groundwater petroleum and related constituent pollution at the named CAP and mini-CAP sites (see Tables 1, 3, and 4 for documentation of compliance);
3. Develop site-specific point of compliance concentrations for surface water and sediment in designated areas (see Table 1 for documentation of compliance);
4. Obtain closure certifications for tanks and FDS pipelines (see Tables 1, 5a, 5b, 8, and 9 for documentation of compliance); and
5. Conduct site-wide surface and groundwater monitoring (see Tables 1 and 7 for documentation of compliance).

Section B of the Order compels the Trust to implement the cleanup plan outlined in Finding 13 and specifies groundwater and soil cleanup standards.

These general requirements of the Cleanup Plan are applied to specific Tasks in Section C of the Order. The Trust's Petroleum Program site investigation and remediation of the Presidio was conducted in accordance with this Cleanup Plan, as evidenced by the Water Board's closure for sites named in the Order (see Tables 1, 3, 4, 5a, 5b, 8, and 9).

2.3.3 Basis for Cleanup Standards

The basis for the cleanup standards applied at the Presidio is described in Findings 12a through 12d of the Order, and is summarized below:

Basis for Groundwater Cleanup Standards

Consistent with State Water Board Resolutions No. 68-16 and No. 92-49 and the Water Board's adopted Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan), the groundwater cleanup standards for the Presidio are the more stringent of the Environmental Protection Agency (EPA) and California primary maximum contaminant levels (MCLs).

Basis for Soil Cleanup Standards

Different soil cleanup standards are applied at different sites, depending on the identified potential receptors (e.g., human-health, the environment or water quality). The Order includes a flow chart that is used to determine which soil cleanup standards (i.e., the most stringent of the applicable standards) are applicable at each site.

2.3.4 Cleanup Goals and Strategy

The cleanup goals and strategy for the Presidio are described in Finding 14 of the Order. For petroleum sites, the cleanup strategy is overseen by the Water Board and is based on meeting surface and groundwater quality objectives, protecting human health and the environment, and conducting risk management, with consideration of the long-term projected land uses at the Presidio and the cost-effectiveness of the corrective action process.

The site investigation and remediation of the Presidio was conducted in accordance with these cleanup goals and strategy, as evidenced by the Water Board's closure of sites named in the Order; see Tables 1, 3, 4, 5a, 5b, 8, and 9.

2.3.5 Public Participation Activities

Although not required under the Order, to comply with the Consent Agreement the Trust prepared and implemented a *Community Relations Plan* (CRP; Trust, 2001) that was based on DTSC guidance. The goal of the CRP is to promote communication, cooperation, and understanding between the Trust and the public. The CRP has been implemented by the Trust to ensure that interested parties and the general public receive accurate, timely, and pertinent information and are provided with an opportunity to comment on and share their concerns about environment restoration activities at the Presidio.

Key elements of the CRP include support and involvement of the Presidio Restoration Advisory Board (RAB); public meetings, workshops, and presentations; public comment periods; fact sheets, newsletters and media outreach; and information repositories. These CRP elements are further discussed below.

Restoration Advisory Board

In 1994, members of the Presidio Technical Review Committee became founding members of the new Presidio RAB. Since 1994, the RAB has served as the key public participation body for input to decision makers for the Presidio Environmental Restoration Program. The RAB is composed of community members and meetings are attended by Trust and NPS staff and regulatory agency representatives. The RAB met the second Tuesday of every month on the status of environmental cleanup activities, planned remediation and investigation activities, and to provide comment on their review of technical documents. In addition to regular RAB meetings, the Trust, NPS, and regulatory agency staff also attended periodic RAB committee meetings and RAB working group meetings, as requested, to focus on issue-specific topics related to cleanup programs or other RAB business or concerns. The RAB disbanded in April 2014, and prepared a report documenting their activities in support of the Presidio Environmental Restoration Program.

Public Meetings, Workshops, and Presentations

The Trust has held public meetings to inform community organizations, neighborhood groups, and the general public when technical milestones have been reached and to provide them with a forum for questions and comments. Notifications of meetings were generally sent to via email to tenants near the site in discussion, individuals on the Presidio Environmental Remediation Mailing List, and other interested parties.

Internet, Fact Sheets, Newsletters, and Media Outreach

The Trust developed an Environmental Remediation section of its internet site where fact sheets, newsletters, and other information pertinent to the Presidio Environmental Remediation Program were available for download. The Trust Internet address is www.presidiotrust.gov.

Information Repositories

An information repository for the Presidio Environmental Restoration Program is located at the Presidio Trust Library at 103 Montgomery Street at the Presidio. The repository includes documents produced to support the environmental restoration program, copies of relevant laws and regulations, the Administrative Record, fact sheets, newsletters, and other relevant information. Many remediation reports are also available on GeoTracker, the Water Board's data registration site.

2.3.6 General Requirements

Project Coordinator

The Trust provided a Project Coordinator whose responsibilities were to receive notices, comments, and approvals from the Water Board. The Project Coordinator is also responsible for the Environmental Remediation Program Schedule, budgets, preparing quarterly status reports, and financial reports, overall management of the Environmental Restoration Program, coordination and communication with the Water Board, DTSC, RAB, NPS, public, and other stakeholders. The current Trust Project Coordinator is Eileen Fanelli, Environmental Remediation Program Manager, who supervises Trust Environmental Remediation staff and the consulting and construction firms under contract to the Trust. Ms. Fanelli is a Professional Geologist with over 30 years of experience working in the environmental remediation field.

Project Engineer/Geologist

In compliance with Provision D.6 of the Order, response actions were performed under the direction and supervision of a qualified professional engineer or professional geologist in the State of California. The work was either directly supervised by qualified Trust staff or a Trust consultant. Technical documents submitted to the Water Board for formal review were signed and stamped by a professional geologist or engineer.

Quality Control/Quality Assurance

The Trust prepared and has followed a *Presidio-Wide Quality Assurance Project Plan and Sampling and Analysis Plan* (QAPP; TetraTech, 2001). The QAPP presents policies, project organization, and quality assurance and quality control (QA/QC) measures to be implemented for environmental investigations or remedial work undertaken by the Trust at the Presidio as part of the Environmental Restoration Program. The QAPP was amended by a letter dated June 23, 2011 (Trust, 2011).

Quarterly Reports, Data and Document Availability, and Records Retention

Required quarterly and semi-annual reports have been prepared in compliance with Task C.1 of the Order. Pertinent records are documented herein (Tables 1 through 11 and in Appendix C) and have been submitted to the Water Board and are available in the Trust library in compliance with Section D.4 of the Order.

Payment of Costs

The Water Board bills the Trust quarterly for oversight activities. All Water Board invoices have been paid by the Trust in accordance with Section D.3 of the Order.

Good Operation and Maintenance

In conformance with Provision D.2 of the Order, the Trust has entered into an Operations and Maintenance Agreement with the DTSC and prepared an *Operations and Maintenance Plan* (Trust, 2012) to ensure continued inspection, maintenance, and reporting on LUCs incorporated into final site cleanups.

2.3.7 Process for Rescission

As described in Section D.12 of the Order, the Water Board may review the Order periodically and revise it when necessary. An October 21, 2013 e-mail from the Water Board requested that the Trust prepare a report documenting the Trust's compliance with the Order in anticipation of Order rescission. The following:

- (1) describes the sites that are subject to the Order,
- (2) inventories the documented actions and approvals that demonstrate the Trust's compliance with the Order requirements, and
- (3) recommends that the Water Board rescind the Order.

The Trust expects that, upon approval of this Report, the Water Board will prepare a letter that acknowledges the material completion of the Trust's Petroleum Program, and rescinds the Order. Future work, including implementation of the *Petroleum Contingency Plan* (EKI, 2004a) for discovery of previously unknown petroleum releases, will be addressed under a separate voluntary cleanup agreements as deemed necessary by the RWQCB.

3.0 SITE RESPONSE ACTION COMPLIANCE

3.1 Task List and Required Elements

Section C of the Order includes 17 tasks, which are discussed below and are listed in Table 1. To facilitate Water Board review, the documentation of the specific actions taken by the Trust to complete the tasks and the completion dates are also included in Table 1 (either directly stated or provided by reference to detailed summary Tables 2 through 11). A listing of references for the reports prepared by the Trust in response to the Order, and the approval letters and other correspondence received from the Water Board are included in Section 6.0 and Appendix C.

Task 1 requires preparation of a comprehensive petroleum investigation and remediation time schedule. The initial schedule was prepared and submitted to the Water Board in November 2003. This schedule was update at irregular intervals through March 2008. A revised baseline

schedule for remaining work as prepared and submitted to the Water Board as part of site status reporting (Task 10) in September 2008. This schedule was updated quarterly thereafter.

Tasks 2 and 3 requested preparation of a work plan and report documenting development and implementation of freshwater corridor surface water and sediment point of compliance concentrations for TPH. A work plan and a report entitled *Development of Freshwater TPH-diesel and TPH-fuel oil Point of Compliance Concentrations* (Blasland, Bouck & Lee, Inc., 2004) were approved by the Water Board (Water Board, 2004a).

Tasks 4, 5, and 6 requested summary reports and work plans for interim actions at CAP sites, site investigation and remediation work plans following implementation of interim actions at CAP sites, and reports documenting final corrective actions at CAP sites. Interim actions were not performed at all CAP sites. Corrective action plans were prepared and implemented for all CAP sites. Reports documenting work at each CAP site are summarized by site in Table 3.

Tasks 7, 8, and 9 requested summary reports and work plans for interim actions at mini-CAP sites, site investigation and remediation work plans following implementation of interim actions at mini-CAP sites, and reports documenting final corrective actions at mini-CAP sites. As above, interim actions were not performed at all mini-CAP sites. Reports documenting work at each mini-CAP site are summarized by site in Table 4.

Task 10 requires submittal of semi-annual site status reports. Semi-annual reports were submitted beginning January 2004 through March 2008, after which time the reports were submitted quarterly. Status reports are summarized in Tables 6 and 2.

Task 11 requires submittal of semi-annual groundwater and surface water monitoring reports. Groundwater monitoring reports are summarized in Table 7.

Task 12 groups USTs, ASTs, and the FDS system and requests closure documentation. The Trust tracked 575 known or unsubstantiated tanks (of which 476 are included in the Petroleum Program³) and 66 FDS segments. Tank closures are summarized by CAP, mini-CAP, and Presidio planning area in Table 5a. No Further Action (NFA) documentation for unsubstantiated tanks is summarized in Table 5b. FDS piping segment closures are summarized in Tables 8 and 9. Key documents associated with tank and FDS remediation are provided in Appendix C.

Task 13 requires five year status reports for sites with groundwater impacts. Reports documenting the effectiveness of corrective actions at groundwater-impacted sites are summarized by site in Table 10.

³ The remaining tanks are subject to DTSC or CCSF jurisdiction and have received or requested closure separate from the Order. The total tank count of 575 does not include active tanks or Coast Guard tanks that are not the Trust's responsibility.

Task 14 requires submittal of a LTTD soil tracking and management plan. The *Low Temperature Thermal Desorption-Treated Soil Tracking and Management Plan* (EKI, 2004b) submitted by the Trust was approved by the Water Board in December 2004 (Water Board 2004c).

Task 15 requires the submittal of a technical report proposing a lead cleanup value for lead released from leaded gasoline releases. The Trust included values for lead cleanup based on soil type and human or ecologic receptor in its report entitled *Development of Presidio-Wide Cleanup Levels for Soil, Sediment, Groundwater and Surface Water* (Trust, 2002b).

Task 16 requires development of a technical report outlining actions in the event unknown petroleum contamination is discovered at the Presidio. The *Petroleum Contingency Plan* (EKI, 2004a) submitted by the Trust was approved by the Water Board in September 2004 (Water Board, 2004b).

Task 17 requires documentation of any delayed compliance. Table 11 presents the resolution of any delayed compliance.

3.2 Actions at Petroleum Sites

Remediation sites subject to the Order are organized in the Petroleum Program by CAPs, mini-CAPs, FDS, and tank sites. The actions conducted at these sites are summarized by project name below, including brief descriptions of the investigation and remediation history and site closure status. The site locations are shown on Figure 1. Additional detailed information for each of the CAP sites is presented in Appendix A; additional information about other sites can be found in the referenced reports (Tables 1 through 11, and Appendix C).

3.2.1 Corrective Action Plan Sites

As each CAP site was unique, the process for investigating, remediating, and closing each site (i.e., Tasks 4 through 6 of the Order) was determined in conjunction with the Water Board, and the cleanup process is documented in the reports referenced in Table 3.

Building 207-231 – Site Closure Granted in 2014: The CAP for this site was submitted in October 2007 and remedial construction was completed in July 2012. The Construction Completion Report (CCR) and closure request was submitted to the Water Board on January 15, 2014. The Water Board concurred with the CCR in an email dated January 16, 2014. The site closure includes implementation of a LUC in a portion of the site requiring additional remediation if the area is developed as a marsh habitat. Water Board closure of the site was received on April 28, 2014.

Commissary/PX Area – Site Closure Granted in 2009: The CAP for this site was approved in 2007 by the Water Board and remedial construction was completed in early 2008. The CCR and closure request was submitted to the Water Board on November 24, 2008. The site closure includes implementation of a LUC requiring future soil management should site soils be disturbed and requiring additional remediation if the area is developed as marsh habitat. Water

Board closure of the site was received on July 13, 2009. Monitoring wells were abandoned on March 23, 2010.

Building 1065 Area – Site Closure Granted in 2012: Remedial construction at this CAP site was completed early 2008. The CCR was submitted to the Water Board in March 2009. The site closure includes implementation of a LUC in portions of the site requiring soil management if subsurface soils are disturbed in future. Post-remediation groundwater monitoring was conducted beginning in 2008. The Trust completed an assessment of the groundwater data and based on the results of monitoring, submitted a site closure request to the Water Board on April 5, 2011. The Water Board issued NFA and case closure letters in March 2012. The remaining wells were abandoned in November 2012.⁴

Building 1349 – Site Closure Granted in 2013: Remedial construction at this CAP site was completed in October 2008. The CCR was submitted to the Water Board in May 2011. The closure includes implementation of a LUC in a portion of the site requiring soil management if subsurface soils are disturbed in future. A groundwater analysis addressing residual TPH with a request for modification of the groundwater monitoring program was submitted to the Water Board on July 5, 2011. The Water Board approved the modification to the monitoring program on July 12, 2011. The Trust conducted an additional year of groundwater monitoring in one on-site well. An updated monitoring report recommending cessation of monitoring and well abandonment was submitted to the Water Board in October 2012. The Water Board concurred and two accessible wells were abandoned in November 2012. The remaining wells were abandoned in July 2013. The Trust submitted a request for site closure on October 31, 2012. The Water Board issued site closure in January 2013.

Building 637 Area – Site Closure Granted in 2008: Remedial construction was completed at this site in 2000. A period of post-remediation groundwater monitoring followed. A five-year review was completed and a request for closure was submitted to the Water Board in 2004. The Water Board closure was received on July 7, 2008. Monitoring wells in this area were destroyed on October 12, 2009.

In March 2013, during construction of the Doyle Drive project, residual petroleum was discovered in the southeastern portion of the Building 637 Area. In conformance with the *Petroleum Contingency Plan* (EKI, 2004a), the Trust informed the Water Board. In a letter dated May 29, 2013, the Water Board directed the Trust to assess the extent of the petroleum. The Trust prepared a work plan, which was approved by the Water Board on June 10, 2013. The investigation activities were initiated in late June 2013. The Trust prepared a corrective action work plan that was approved by the Water Board in September 2013. The Trust completed the corrective action including soil removal in January 2014, and submitted a final CCR with a LUC

⁴ Well 1065MW103A was inadvertently omitted from the November 2012 well destruction event and was subsequently destroyed on July 16, 2013.

in May 2014. Residual hydrocarbon impacts within the LUC Area are temporarily inaccessible and will be addressed in the future under a voluntary cleanup agreement in coordination with the Water Board. The Building 637 Area CCR concluded that the Building 637 Area does not present a significant risk to human health or the environment and meets the Water Board's criteria for Low-Threat case closure once the extent of residual TPH in soil is defined, and remediated, if necessary.

3.2.2 Mini-CAP Sites

As noted in the Order, the mini-CAP sites are petroleum release sites that had no impact to groundwater and required relatively minor additional corrective action or site investigation following work completed by the Army. As summarized in Table 4, the 27 mini-CAP sites named in the Order have been assessed and remediated. Because each mini-CAP site was unique, the process for investigating, remediating, and closing each site (i.e., Tasks 7 through 9 of the Order) was determined in conjunction with the Water Board, and the site-specific process was documented in the reports referenced in the footnotes to Table 4. Table 4 references the specific report(s) that each mini-CAP is included in, as well as the date of the Water Board closure letter. Tables 5a and 5b summarize the tank closures that were conducted under Water Board oversight; these also include the mini-CAP sites.

3.2.3 Fuel Distribution System

As shown in Tables 8 and 9, the former FDS pipelines that supplied fuel oil to Presidio storage tanks have been removed or capped and abandoned in place, assessed, and remediated in accordance with Task 12 of the Order. The Water Board has granted closure of the 66 segments.

The Trust submitted a request for closure for segments included in Phase I of the FDS work in January 2006. Additional clarifying information was provided to the Water Board in an October 3, 2008 addendum to the closure request. The Water Board issued closure of the Phase I FDS segments on September 16, 2009.

The closure request for Phase II FDS segments in Area B was submitted to the Water Board on February 18, 2008. The request for closure for the Phase II Area A segments was submitted to the Water Board on March 13, 2009.

A Phase III Area B investigation report and closure request was submitted on October 7, 2009. On July 27, 2010 the Water Board requested that the Trust revise the format of data presentation to facilitate Water Board review and closure of individual FDS segments. The Trust submitted the revised Phase II Area B closure request to the Water Board on March 7, 2011; the Phase III Area B closure requests on March 8, 2011, and the Phase II Area A closure request on March 16, 2011. Table 9 presents a summary of the status of the Water Board-closed FDS segments by closure group.

3.2.4 Tanks in Areas A and B

The Trust maintains a database of the 575 ASTs and USTs formerly located at the Presidio⁵. To facilitate closure documentation, these tank sites have in many cases been grouped based on physical location and/or remedial status. For most tanks outside CAP sites, the Trust created eight priority groups for closure based on geography, completeness of closure documents, and priority for other Trust development. The priority groups included:

- Priority 1 – tanks located in the Building 637 Area;
- Priority 2 – tanks located in the Crissy Field Area;
- Priority 3 – tanks located in the Directorate of Engineering and Housing (DEH) Area;
- Priority 4 – a large group of tanks that was ready for closure based on Army data or that needed closure sooner for Trust redevelopment activities;
- Priority 5 – tanks located in Area A under NPS jurisdiction;
- Priority 6 – a large group of tanks that was initially lower priority, but could be closed based on Army data;
- Priority 7 – a group of tanks that required additional data prior to closure; and
- Priority 8 – a large group of tanks for which documentation of their existence was incomplete (i.e., unsubstantiated tanks). The Trust prepared a series of summary reports that present the available documentation for these tanks. If a tank was found to exist and closure documentation was available, the tank was moved to Priority 7 for closure. The Water Board issued three NFA letters for the unsubstantiated tanks.

The priority groups were established for Trust convenience and organization, and some of the referenced reports include the priority in the document title. However, as tank closures have been completed, the priority designation is no longer relevant. The final summary of tank closures under Water Board oversight (Table 5a) are organized by tanks in CAP sites, tanks in specific areas (e.g., DEH or Crissy Field), and tanks in other areas. NFA documentation for unsubstantiated tanks is presented in Table 5b.

3.3 Self-Monitoring Program

In accordance with Task 11 of the Order, the Trust has conducted a quarterly groundwater monitoring program since August 2001, with oversight from the Water Board. In addition to

⁵ 100 of these tanks are under the jurisdiction of the DTSC or the CCSF and are thus not covered in this report.

monitoring groundwater at nearly 300 wells, surface water from seeps has also been sampled (Tables 1 and 7). In accordance with the Order, the Trust has submitted Semi-Annual Groundwater Monitoring Reports to the Water Board since 2003. Currently, only 11 wells and six surface water locations are actively being monitored; these are located at Landfill E, the NIKE Facility, and Baker Beach Disturbed Area 1, all CERCLA sites.

3.4 Petroleum Contingency Plan

Periodically, as part of construction, maintenance or other subsurface operations, previously unknown tanks or soil impacted with petroleum or related constituents have been identified within the Presidio. In 2004, in accordance with Task 16 of the Order, the Trust developed a *Petroleum Contingency Plan* (EKI, 2004a) that standardized the processes for reporting, investigating and cleaning up these sites, as follows:

- Notify the regulatory agencies (Water Board, California EPA, DTSC, and City of San Francisco), as appropriate;
- Perform soil and tank pit water sampling and analyses;
- Report any interim remedial measures taken and analytical sampling results to the appropriate regulatory agencies;
- Conduct any additional remedial actions under CAP or mini-Cap protocols; and
- Develop a schedule to implement the necessary remedial actions to achieve the cleanup levels described in the Order and to gain site closure.

As shown in Table 1, the Water Board approved the Trust's *Petroleum Contingency Plan* (EKI, 2004a) in December 2004 (Water Board, 2004b).

4.0 SITE O&M AGREEMENT AND O&M PLAN

Section D.2 of the Order requires that the dischargers maintain good working order and efficient operation of any facility or control system installed pursuant to the requirements of the Order.

In November 2012, the DTSC, Trust, and NPS signed an Operation and Maintenance Agreement that details the roles and responsibilities for the development, implementation, reporting and review of on-going operations and maintenance (O&M) activities for sites within the Presidio.

The Trust prepared an *Operations and Maintenance Plan* (O&M Plan; Trust, 2012) that was appended to the O&M Agreement and details the O&M activities at each site included in the O&M Plan. Per the O&M Plan, an annual report is prepared to describe the prior year's O&M activities. The August 2013 *Operations and Maintenance Plan Annual Report* (EKI, 2013) was the first annual O&M report to be completed.

Activities included in the O&M Plan include, as appropriate, containment cap monitoring, groundwater monitoring, landfill gas monitoring, stormwater pollution prevention plan inspections, and LUC inspections. Table 1 in Attachment A of the August 2013 *Operations and Maintenance Plan Annual Report* (EKI, 2013) summarizes the specific O&M actions that are implemented at each site. The LUCs are described in detail in the *Land Use Controls Master References Report* (LUCMRR; EKI, 2009) and include Sensitive Use Restrictions, Health and Safety Requirements, Soil Management Requirements, and Surface Cover Requirements.

The petroleum sites with LUCs include:

- Building 637 Area
- Building 1065 Area
- Commissary/PX Area
- Building 1349 Area
- Former UST 51
- Former UST 748/750 and FDS Section BR13-2 Area
- Areas with LTTD Soil

All petroleum-related groundwater monitoring has been completed.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The following section presents the conclusions of the compliance assessment and presents the Trust's recommendation that the Water Board rescind the Order.

5.1 Summary and Conclusions

As described above, and documented in Tables 1 through 11, the Trust has generally followed the remediation strategy and cleanup plan prescribed in the Order by maintaining a Remediation Program Schedule (see Appendix B), preparing quarterly reports documenting compliance, consulting regularly with the Water Board, and completing response actions appropriate to each of the listed sites.

Based on the work completed to date, the Water Board has determined that the sites listed in the Order have met the criteria for closure or NFA .

5.2 Recommendations

Based on the compliance assessment, the Trust requests and recommends that the Water Board rescind the Order.

For additional sites that are not listed in the Order, the Army will retain overall financial responsibility as outlined in the Presidio MOA, and the Trust will implement approved corrective actions, with Water Board oversight under the existing *Petroleum Contingency Plan* (EKI, 2004a), a voluntary cleanup agreement, or site-specific agreement.

6.0 REFERENCES

AMEC, 2014. Basewide Report of Compliance, 1999 Consent Agreement, Presidio of San Francisco, California.

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Water Board. 7 September 2004b. Approval of the Draft Report Titled “Petroleum Contingency Plan, Presidio of San Francisco” as required by Task 16 of Site Cleanup Order No. R2-2003-0080.

Water Board. 22 December 2004c. Approval of the Low Temperature Thermal Desorption-Treated Soil Tracking and Management Plan, Presidio of San Francisco, California.

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See Tables 1 through 11 and Appendix C for listings of additional, applicable references.

Table 1
SUMMARY OF DOCUMENTATION OF TASKS IN WATER BOARD ORDER

Water Board Order R2-2003-0080

Presidio of San Francisco
 San Francisco, CA

Task in Order	Documentation of Compliance	Completion and/or Water Board Approval Date
Task 1: Comprehensive Petroleum Investigation and Remediation Time Schedule	Table 2 identifies the dates of the first schedule submittal and the subsequent submittals.	The initial schedule was submitted on November 21, 2003. An updated schedule was submitted on January 18, 2008, and quarterly thereafter.
Task 2: Workplan For Development Of Freshwater Corridor Surface Water and Sediment Point Of Compliance Concentrations (PCOCs)	The document prepared by Blasland, Bouck & Lee, Inc., July 15, 2004 <i>Development of Freshwater TPH-diesel and TPH-fuel oil Point of Compliance Concentrations, Presidio of San Francisco</i> , fulfills Tasks 2 and 3.	Report submitted to the Water Board on July 15, 2004. Report approved by Water Board in letter dated September 7, 2004.
Task 3: Report Documenting the Implementation of the Freshwater Corridor Surface Water and Sediment Point Of Compliance Concentrations (PCOCs) Approach		
Task 4: Interim Remedial Action Work Plan for Corrective Action Plan (CAP) Sites	Table 3 provides a summary listing of reports for work conducted at CAP sites, organized by CAP site. Appendix A provides a summary of history, corrective action, and closure at each CAP Site.	<u>Building 1065 Area:</u> <ul style="list-style-type: none"> • Construction Completion Report (CCR): March 2009 • No Further Action (NFA): March 29, 2012 <u>Building 207/231 Area:</u> <ul style="list-style-type: none"> • CCR: January 15, 2014 • NFA: April 28, 2014 <u>Building 1349:</u> <ul style="list-style-type: none"> • CCR: March 2011 • NFA: February 11, 2013 <u>Commissary/PX:</u> <ul style="list-style-type: none"> • CCR: November 24, 2008 • NFA: July 13, 2009 <u>Building 637:</u> <ul style="list-style-type: none"> • CCR: March 31, 2004 • NFA: July 7, 2008
Task 5: Completion of Interim Remedial Actions at Corrective Action Plan Sites		
Task 6: Proposed Final Corrective Action Plan and Cleanup Standards at CAP Sites		

Table 1
SUMMARY OF DOCUMENTATION OF TASKS IN WATER BOARD ORDER

Water Board Order R2-2003-0080

Presidio of San Francisco
 San Francisco, CA

Task in Order	Documentation of Compliance	Completion and/or Water Board Approval Date
Task 7: Summary Report and Work Plan For Mini-CAP Sites	Table 4 provides a summary listing of reports for work conducted at Mini-CAP sites.	<u>Tanks:</u> 42, 100.1, 101.1, 101.2, 102.1, 102.2, 103.1, 104.1, 104.2 <ul style="list-style-type: none"> • NFA: December 16, 2003
Task 8: Completion of Site Investigation and Remediation Work Plan at Mini-CAP Sites	Table 5a provides a summary listing of tank closures, including Mini-CAP tanks.	<u>Tank:</u> 1451.1 <ul style="list-style-type: none"> • NFA: September 2, 2008
Task 9: Completion of Final Remedial Actions at Mini-CAP Sites		<u>Tanks:</u> 3, 514.1, 651, 951, 1030, 1221.1, 1221.2, 1221.3, 1221.4 <ul style="list-style-type: none"> • NFA: November 9, 2010 <u>Tanks:</u> 334, 338.1, 339, 342, 343 <ul style="list-style-type: none"> • NFA: March 1, 2011 <u>Tank:</u> 970/971 <ul style="list-style-type: none"> • NFA: February 15, 2012 <u>Tank:</u> 1260 <ul style="list-style-type: none"> • NFA: June 5, 2012 <u>Tank:</u> 1213.1 <ul style="list-style-type: none"> • NFA: September 26, 2012
Task 10: Site Status Reports	Table 6 identifies the site status reports submitted.	Reports submitted semi-annually beginning January 15, 2004.
Task 11: Site-Wide Groundwater/Surface Water Semi-Annual Monitoring Reports	Table 7 identifies the monitoring reports submitted.	Reports submitted semi-annually beginning October 15, 2003.

Table 1
SUMMARY OF DOCUMENTATION OF TASKS IN WATER BOARD ORDER

Water Board Order R2-2003-0080

Presidio of San Francisco
 San Francisco, CA

Task in Order	Documentation of Compliance	Completion and/or Water Board Approval Date
Task 12: Underground Storage Tank (UST), Aboveground Storage Tank (AST), and Fuel Distribution System (FDS) Closure Certification	<p>Tables 5a and 5b summarize the closure or No Further Action status and documentation for the USTs and ASTs at the Presidio under the Water Board's jurisdiction.</p> <p>Table 8 provides a summary listing of reports for work at FDS segments, organized by phase. A listing of FDS segments by phase and closure date is provided in Table 9.</p>	See Tables 5a & 5b and Tables 8 & 9 for dates of closure or No Further Action for individual tanks or FDS segments, respectively.
Task 13: Five-Year Status Report	Table 10 provides a summary listing of the technical reports that evaluate the effectiveness of the approved CAPs.	See closure dates in Table 10 .
Task 14: Low Temperature Thermal Desorption (LTTD) Soil Tracking and Management	Erler & Kalinowski, Inc., November 2004b. <i>Low Temperature Thermal Desorption-Treated Soil Tracking and Management Plan, Presidio of San Francisco, California</i> .	<p>Report submitted to the Water Board on November 1, 2004.</p> <p>Report approved by Water Board in letter dated December 22, 2004.</p>
Task 15: Lead Cleanup Value Proposal	Although never specifically requested, the Trust's <i>Development of Presidio-Wide Cleanup Levels for Soil, Sediment, Groundwater, and Surface Water</i> , dated October 2002, fulfills the requirements of this task.	October 2002
Task 16: Contingency Petroleum Sites	Erler & Kalinowski, Inc., August 16, 2004a. <i>Petroleum Contingency Plan, Presidio of San Francisco, California</i> .	<p>Report submitted to the Water Board on August 16, 2004</p> <p>Report approved by Water Board in letter dated September 7, 2004.</p>
Task 17: Delayed Compliance	Table 11 provides a summary listing of the documents associated with delayed compliance and the remediation time schedule.	Delayed tasks have been completed.

Table 2
SUMMARY LISTING OF PETROLEUM PROGRAM SCHEDULES AND QUARTERLY REPORTS

Water Board Order R2-2003-0080
 Presidio of San Francisco
 San Francisco, CA

Date of Submittal	Document Title
November 21, 2003	<i>Comprehensive Petroleum Investigation and Remediation Time Schedule, Site Cleanup Requirements; RWQCB Order R2-2003-0080, Presidio of San Francisco – San Francisco, California.</i>
January 18, 2008	<i>Updated Comprehensive Petroleum Investigation and Remediation Time Schedule Site Cleanup Requirements; Water Board Order R2-2003-0080, Presidio of San Francisco – San Francisco, California.</i>
September 24, 2008	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 14 Third Quarter Fiscal Year 2008</i>
November 10, 2008	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 15 Fourth Quarter Fiscal Year 2008</i>
February 27, 2009	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 16 First Quarter Fiscal Year 2009</i>
May 26, 2009	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 17 Second Quarter Fiscal Year 2009</i>
August 20, 2009	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 18 Third Quarter Fiscal Year 2009</i>
November 17, 2009	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 19 Fourth Quarter Fiscal Year 2009</i>
February 26, 2010	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 20 First Quarter Fiscal Year 2010</i>
May 11, 2010	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 21 Second Quarter Fiscal Year 2010</i>
August 7, 2010	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 22 Third Quarter Fiscal Year 2010</i>
November 22, 2010	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 23 Fourth Quarter Fiscal Year 2010</i>
February 15, 2011	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 24 First Quarter Fiscal Year 2011</i>

Table 2
SUMMARY LISTING OF PETROLEUM PROGRAM SCHEDULES AND QUARTERLY REPORTS

Water Board Order R2-2003-0080
 Presidio of San Francisco
 San Francisco, CA

Date of Submittal	Document Title
May 9, 2011	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 25 Second Quarter Fiscal Year 2011</i>
August 10, 2011	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 26 Third Quarter Fiscal Year 2011</i>
November 14, 2011	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 27 Fourth Quarter Fiscal Year 2011</i>
January 12, 2012	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 28 First Quarter Fiscal Year 2012</i>
April 9, 2012	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 29 Second Quarter Fiscal Year 2012</i>
July 12, 2012	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 30 Third Quarter Fiscal Year 2012</i>
October 12, 2012	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 31 Fourth Quarter Fiscal Year 2012</i>
January 15, 2013	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 32 First Quarter Fiscal Year 2013</i>
April 15, 2013	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 33 Second Quarter Fiscal Year 2013</i>
July 8, 2013	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 34 Third Quarter Fiscal Year 2013</i>
October 15, 2013	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 35 Fourth Quarter Fiscal Year 2013</i>
January 15, 2014	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 36 First Quarter Fiscal Year 2014</i>
April 17, 2014	<i>Presidio Trust Remediation Program Quarterly Program Status Report, Financial Report Number 37 Second Quarter Fiscal Year 2014</i>

Table 3
SUMMARY LISTING OF REPORTS FOR CORRECTIVE ACTION PLAN SITES

Water Board Order R2-2003-0080
 Presidio of San Francisco
 San Francisco, CA

Site	Document
Building 207/231	Stollar, R.L., & Associates, February 1992. <i>Draft Final Interim Remedial Action for Building 231, Presidio of San Francisco, California.</i>
	MACTEC, March 3, 2004. <i>Final Data Gaps Investigation Work Plan, Building 207/231 Area, Presidio of San Francisco, San Francisco, California.</i>
	MACTEC, December 16, 2004. <i>Data Gaps Investigation Report, Building 207/231 Area, Presidio of San Francisco, San Francisco, California.</i>
	MACTEC, June 22, 2006. <i>Technical Memorandum Evaluation of Arsenic and Other Metals in Groundwater at Three Corrective Action Plan Sites, Presidio of San Francisco, San Francisco, California.</i>
	MACTEC, October 19, 2007. <i>Final Corrective Action Plan, Building 207/231 Area, Presidio of San Francisco, San Francisco, California.</i>
	Presidio Trust, July 30, 2008. <i>Corrective Action Plan Addendum, Building 207/231 Area, Presidio of San Francisco, San Francisco, California.</i>
	MACTEC, October 23, 2008. <i>Final Corrective Action Implementation Work Plan, Building 207/231 Area, Presidio of San Francisco, California.</i>
	AMEC, June 20, 2012. <i>Addendum to Final Corrective Action Plan, Building 207/231 Area, Presidio of San Francisco, San Francisco, California.</i>
	AMEC, January 15, 2014. <i>Construction Completion Report, Building 207/231 Area, Presidio of San Francisco, California.</i>
	AMEC, February 7, 2014. <i>Evaluation of Post-Remediation Groundwater Monitoring Results, Building 207/231 Area, Presidio of San Francisco.</i>
	Water Board, April 28, 2014. <i>No Further Action for the Building 207/231 Area, Presidio of San Francisco, San Francisco County.</i>
Commissary/PX Area	Presidio Trust, March 2001. <i>Final Commissary Seeps Interim Source Removal Action Plan, Presidio of San Francisco.</i>
	Treadwell & Rollo, January 2002. <i>Draft Commissary Seeps Interim Source Removal Action Report, Presidio of San Francisco, California.</i>
	Treadwell & Rollo, Inc., December 16, 2005. <i>Final Corrective Action Plan, Commissary/PX Study Area, Presidio of San Francisco, California.</i>
	Geomatrix, June 2, 2006. <i>Phase I Corrective Action Plan Work Plan, Commissary/PX Study Area, The Presidio of San Francisco, San Francisco, California.</i>
	MACTEC, June 22, 2006. <i>Technical Memorandum Evaluation of Arsenic and Other Metals in Groundwater at Three Corrective Action Plan Sites, Presidio of San Francisco, San Francisco, California.</i>
	Presidio Trust, March 10, 2008. <i>Amendment to Phase I Corrective Action Plan Work Plan, Corrective Action Work Plan for Phase 2 Area, Commissary/PX Study Area, Presidio of San Francisco, San Francisco, California.</i>
	AMEC, November 24, 2008. <i>Correction Action Plan Implementation and Closure Report, Commissary/PX Study Area, Presidio of San Francisco, California.</i>
	Water Board, July 13, 2009. <i>No Further Action, Commissary/PX Study Area.</i>
Building 1065 Area	MACTEC, February 19, 2003. <i>Interim Data Report, Building 1065 Area, Presidio of San Francisco, San Francisco, California.</i>
	MACTEC, July 28, 2003. <i>Final Interim Action Plan, Building 1065 Corrective Action Plan Area, Presidio of San Francisco, San Francisco, California.</i>
	MACTEC, July 1, 2004. <i>Draft Final Completion Report, Phase I Interim Action, Building 1065 Corrective Action Plan Area, Presidio of San Francisco, California.</i>
	MACTEC, June 22, 2006. <i>Technical Memorandum Evaluation of Arsenic and Other Metals in Groundwater at Three Corrective Action Plan Sites, Presidio of San Francisco, San Francisco, California.</i>
	MACTEC, January 24, 2007. <i>Final Corrective Action Plan, Building 1065 Area, Presidio of San Francisco, California.</i>
	MACTEC, September 6, 2007. <i>Final Corrective Action Implementation Work Plan, Building 1065 Area, Presidio of San Francisco, California.</i>
	MACTEC, March 10, 2009. <i>Construction Completion Report, Building 1065 CAP Area, Presidio of San Francisco, California.</i>
	MACTEC, May 13, 2010. <i>Request for Closure and Transmittal of Groundwater Evaluation, Building 1065 CAP Area, Presidio of San Francisco, California.</i>
	Presidio Trust, April 5, 2011. <i>Revised Closure Request, Building 1065 Area, Presidio of San Francisco, San Francisco, California.</i>
	Water Board, March 29, 2012. <i>No Further Action for the Building 1065 Area, and Uniform Case Closure Letter, Building 1065 Area.</i>

Table 3
SUMMARY LISTING OF REPORTS FOR CORRECTIVE ACTION PLAN SITES

Water Board Order R2-2003-0080
 Presidio of San Francisco
 San Francisco, CA

Site	Document
Building 1349	IT Corporation, July 1995. <i>Interim Removal Action Work Plan, Removal of Aboveground Storage Tank, Building 1349, Presidio of San Francisco, San Francisco, California.</i>
	IT Corporation, May 1996. <i>Aboveground Storage Tank Closure Report, Building 1349, Presidio of San Francisco.</i>
	Blasland, Bouck & Lee, Inc., February 14, 2006. <i>Final Corrective Action Plan for Building 1349 Study Area in the Presidio of San Francisco, California.</i>
	Blasland, Bouck & Lee, Inc., November 1, 2007. <i>Corrective Action Plan Implementation Work Plan, Building 1349 Study Area, Presidio Trust, San Francisco, California.</i>
	ARCADIS, March 23, 2011. <i>Corrective Action Implementation Report for Soil at the Building 1349 Study Area.</i>
	Presidio Trust, July 5, 2011. <i>Groundwater Assessment with Proposed Groundwater Monitoring of Well 1349MW100 Corrective Action Plan Area, Building 1349, Presidio of San Francisco, San Francisco, California.</i>
	Presidio Trust, October 5, 2012. <i>Groundwater Assessment and Request to Terminate Groundwater Monitoring of Well 1349MW100 Corrective Action Plan Area, Building 1349, Presidio of San Francisco - San Francisco, California.</i>
	Presidio Trust, October 31, 2012. <i>Request for Site Closure, Building 1349 Study Area.</i>
	Water Board, February 11, 2013. <i>No Further Action for Building 1349 Study Area and FDS Sections MT-6 and MT-7, Presidio of San Francisco, San Francisco County.</i>
Building 637 Area	Montgomery Watson, May 30, 1996. <i>Soil Excavation Report/Soil Treatability Study Report No. 1, Interim Remedial Action, Building 637 Area, Presidio of San Francisco, California.</i>
	Montgomery Watson, August 1999. <i>Final Corrective Action Plan, Building 637 Area, Presidio of San Francisco, California.</i>
	Presidio Trust, August 1999. <i>Corrective Action Plan, Building 637 Area, Work Plan, The Presidio of San Francisco, California.</i>
	Erler & Kalinowski, Inc., June 22, 2000. <i>Excavation Report for the Building 637 Area at the Presidio of San Francisco.</i>
	Erler & Kalinowski, Inc., March 31, 2004. <i>Building 637 Area Completion Report, Presidio of San Francisco, California.</i>
	Water Board, July 7, 2008. <i>No Further Action Building 637 Area and Approval of Building 637 Completion Report (2004).</i>
	Water Board, May 29, 2013. <i>Work Plan to Investigation Former Building 637 Area, Presidio of San Francisco, San Francisco County.</i>
	Erler & Kalinowski, Inc., 2013. <i>Building 637 Area Investigation Work Plan, Presidio of San Francisco, California.</i> May 30, 2013.
	Erler & Kalinowski, Inc., September 12, 2013. <i>Building 637 Area Corrective Action Work Plan, Presidio of San Francisco, California.</i>
	Erler & Kalinowski, Inc., May 1, 2014. <i>Building 637 Area Corrective Action Implementation Report, Presidio of San Francisco, California.</i>

Table 4
SUMMARY LISTING OF REPORTS FOR MINI-CAP SITES

Water Board Order R2-2003-0080
 Presidio of San Francisco
 San Francisco, CA

Site	Trust Document Reference	Water Board Reference
UST-3	2, 6	11
UST-42	1	9
UST-100.1	1	9
UST-101.1	1	9
UST-101.2	1	9
UST-102.1	1	9
UST-102.2	1	9
UST-103.1	1	9
UST-104.1	1	9
UST-104.2	1	9
UST-334	2	12
UST-338.1	2, 6	12
UST-339	2, 6	12
UST-342	2, 6	12
UST-343	2, 6	12
UST-514.1	2, 6	11
UST-651	2, 6	11
UST-951	1, 7	11
UST-1030	2, 6	11
UST-1213	2, 6	15
UST-1221.1	2, 6	11
UST-1221.2	2, 6	11
UST-1221.3	2, 6	11
UST-1221.4	2, 6	11
UST-1260	2, 6	14
UST-1451	3, 4	10
Building 970/971	5, 8	13

Trust Document References:

- (1) Geo/Resource Consultants, Inc., February 20, 2003. Summary Additional Investigations, Mini-CAP Sites, Presidio of San Francisco, San Francisco, California.
- (2) Geo/Resource Consultants, Inc., March 2004. Mini-CAP Site Review and Recommendations to Address Former Petroleum Tank Release Sites, Presidio of San Francisco, San Francisco, California.
- (3) Geomatrix, May 8, 2005. Draft Final Site Investigation Work Plan Tank 1451.1 Mini CAP Site, the Presidio of San Francisco, California.
- (4) Geomatrix, October 14, 2005. Draft Final Site Investigation Report, Tank 1451.1 Mini-CAP Site.
- (5) EKI, May 4, 2007. Field Sampling Plan for Former Building 970, Presidio of San Francisco, California.
- (6) Geo/Resource Consultants, Inc., May 14, 2007. Mini-CAP Additional Investigations, Excavation, and Groundwater Monitoring Well Installations to Address Former Petroleum Release Site.
- (7) Presidio Trust, April 28, 2009. Submittal of Information for Identified Geotracker Sites and Closure Request for Selected Tanks.
- (8) EKI, May 9, 2011. Field Investigation Report and Closure Request for Former Aboveground Storage Tank 970 / Building 971 Area, Presidio of San Francisco, California.

Table 4
SUMMARY LISTING OF REPORTS FOR MINI-CAP SITES

Water Board Order R2-2003-0080
Presidio of San Francisco
San Francisco, CA

Water Board Document References:

- (9) December 16, 2003: Concurrence on Request for No Further Action at Nine Former UST "Mini-CAP" Sites Located at the Presidio of San Francisco, San Francisco, California.
- (10) September 2, 2008: Transmittal of Closure Letter and Site Closure Summary for Underground Storage Tank (UST) 1451.1, Presidio of San Francisco, San Francisco County.
- (11) November 9, 2010: Closure Approval for eight UST Sites, Presidio of San Francisco, San Francisco County.
- (12) March 1, 2011: No Further Action for Nine Infantry Terrace Tank Sites, Presidio of San Francisco, San Francisco County.
- (13) February 15, 2012: No Further Action at Former AST 970/Building 971, Presidio of San Francisco, San Francisco County.
- (14) June 20, 2012: No Further Action for UST 1260, Presidio of San Francisco, San Francisco, San Francisco County.
- (15) September 26, 2012: No Further Action for UST 1213.1, Presidio of San Francisco, San Francisco, San Francisco County.

Table 5a
SUMMARY OF TANK CLOSURES
 Water Board Order R2-2003-0080
 Presidio of San Francisco
 San Francisco, CA

Tank ID	Tank Type	Geotracker ID	Case ID	Water Board Closure Letter	Trust Closure Request Letter
CAP Sites					
1065 CAP					
1027.1	UST	T0600192249	38D9232	No Further Action for the Building 1065 Area, Presidio of San Francisco, San Francisco, San Francisco County, March 29, 2012.	Request for Closure and Transmittal of Groundwater Evaluation Building 1065 CAP Area, Presidio of San Francisco, California, May 13, 2010.
1040.1	AST				
1040.2	AST				
1047.1	AST				
1047.2	AST				
1047.3	AST				
1047.4	UST				
1065.1	UST				
1065.2	UST				
1065.3	UST				
1065.4	UST				
1065 Hot well/sump	UST				
Building 207/231					
207.1	UST	T0600192251	38D9234	No Further Action for the Building 207/231 Area, Presidio of San Francisco, San Francisco County, April 28, 2014.	Construction Completion Report, Building 207/231 Area, Presidio of San Francisco, California, January 15, 2014.
207.2	UST				
207.3	UST				
208	UST				
228.1	UST				
228.2	UST				
228.3	UST				
231.1	UST				
231.2	UST				
231.3	UST				
231.4	UST				
231.5	UST				
231.6	UST				
231.7	UST				
231 H1 - H6	UST				
Building 1349					
1349	AST	T0609592303	38D9309	No Further Action for Building 1349 Study Area and FDS Sections MT-6 and MT-7, Presidio of San Francisco, San Francisco, San Francisco County, February 11, 2013.	Request for Site Closure Building 1349 Study Area Water Board Case No. 38D9309, Presidio of San Francisco, California, October 31, 2012

Table 5a
SUMMARY OF TANK CLOSURES
 Water Board Order R2-2003-0080
 Presidio of San Francisco
 San Francisco, CA

Tank ID	Tank Type	Geotracker ID	Case ID	Water Board Closure Letter	Trust Closure Request Letter				
Commissary/Post Exchange									
634	AST	T0609592180	38D9266	No Further Action, Commissary/PX Study Area, Presidio of San Francisco, San Francisco County, July 13, 2009.	Request for Closure and Transmittal of the Corrective Action Plan Implementation and Closure Report Commissary/PX Study Area, Presidio of San Francisco, San Francisco, California, November 24, 2008.				
FDS-1	UST								
Building 637 Area									
637.1	AST	T0609592307	38D9400	No Further Action, Building 637 Area, Presidio of San Francisco, July 7, 2008.	Building 637 Area Completion Report, Presidio of San Francisco, California, April 2, 2004.				
637.2	AST								
637.3	AST								
637.4	AST								
637.5	AST								
637.6	AST								
640.1	AST								
640.2	UST								
640.3	UST								
640.4	UST								
640.5	UST								
642.1	AST								
642.2	UST								
637.VR	UST								
638.OW	UST								
Mini-Cap Sites									
1451.1	UST	T10000000180	38D9375	Transmittal of Closure Letter and Site Closure Summary for Underground Storage Tank (UST) 1451.1, Presidio of San Francisco, San Francisco County, September 2, 2008.	Construction Completion Report, Tank 1451.1 Mini-CAP Site, Presidio of San Francisco, California, April 2008.				
3	UST	T0600192257	38D9240	Closure Approval for eight UST Sites, Presidio of San Francisco, San Francisco County, November 9, 2010.	Submittal of Information for Identified Geotracker Sites and Closure Request for Selected Tanks, Presidio of San Francisco, California, April 28, 2009.				
514.1	UST	T0609592174	38D9260						
651	UST	T0600192253	38D9236						
951	UST	T0608592289	38D9295						
1030	UST	T0608592292	38D9298						
1221.1	UST	T0608592294	38D9300						
1221.2	UST								
1221.3	UST								
1221.4	UST								

Table 5a
SUMMARY OF TANK CLOSURES
 Water Board Order R2-2003-0080
 Presidio of San Francisco
 San Francisco, CA

Tank ID	Tank Type	Geotracker ID	Case ID	Water Board Closure Letter Mini-Cap Sites	Trust Closure Request Letter
42	UST	T0601392258	38D9241	Concurrence on Request for No Further Action at Nine Former UST "Mini-CAP" Sites Located at the Presidio of San Francisco, San Francisco, California, December 16, 2003.	Summary Report of Additional Investigations for Mini-CAP Sites Located at the Presidio of San Francisco, San Francisco, California, February 2003.
100.1	UST	T0601392259	38D9242		
101.1	UST	T0601392260	38D9243		
101.2	UST	T0601392261	38D9244		
102.1	UST	T0601392262	38D9245		
102.2	UST	T0601392263	38D9246		
103.1	UST	T0607592264	38D9247		
104.1	UST	T0607592265	38D9248		
104.2	UST	T0607592266	38D9249		
334	UST	T0607592268	38D9251	No Further Action for Nine Infantry Terrace Tank Sites, Presidio of San Francisco, San Francisco County, March 1, 2011.	Closure Request for Nine Infantry Terrace Tanks, Presidio of San Francisco, California, October 15, 2010. (See Note a)
338.1	UST	T10000002822	38D9252		
339	UST	T10000002824	38D9253		
342	UST	T10000002826	38D9254		
343	UST	T10000002828	38D9255		
970/971	AST	T0600192226	38D9209	No Further Action at Former AST 970/Building 971, Presidio of San Francisco, San Francisco County, February 15, 2012.	Field Investigation Report and Closure Request for Former Aboveground Storage Tank ("AST") 970/Building 971 Area, Presidio of San Francisco, California, May 9, 2011.
1213.1	UST	T10000004267	None assigned	No Further Action for UST 1213.1, Presidio of San Francisco, San Francisco, San Francisco County, September 26, 2012.	Field Sampling Report and Closure Request for Former UST 1213.1 Sub-Slab Vapor Investigation and Vapor Intrusion Assessment, Presidio of San Francisco, California, September 1, 2010. Transmittal of Field Sampling Report and Revised Closure Request Former UST 1213.1, Presidio of San Francisco, California, November 29, 2011.
1260	UST	T0609592299	38D9305	No Further Action for UST 1260, Presidio of San Francisco, San Francisco, San Francisco County, June 20, 2012.	Closure Request for Selected Tanks at Various Locations, Presidio of San Francisco, California, August 7, 2009. Addendum to Submittal of Information for Identified Geotracker Sites and Closure Request for Selected Tanks, Presidio of San Francisco, California, January 10, 2011.

Table 5a
SUMMARY OF TANK CLOSURES
 Water Board Order R2-2003-0080
 Presidio of San Francisco
 San Francisco, CA

Tank ID	Tank Type	Geotracker ID	Case ID	Water Board Closure Letter	Trust Closure Request Letter		
Additional Tanks Closed							
DEH Area							
268.1	AST	DOD100407700	38D9322	Case Closure Letter for Aboveground Storage Tanks (ASTs), Directorate of Engineering and Housing Area, Presidio of San Francisco, August 20, 2008.	Crissy Field and Directorate of Engineering and Housing Tank Sites Closure Certificate Report, Presidio of San Francisco, California, September 8, 2006.		
286	AST	T10000000042	38D9324				
288	AST	T10000000043	38D9325		Addendum to Crissy Field and Directorate of Engineering and Housing Tank Sites Closure Certification Report, Presidio of San Francisco, California, July 8, 2008.		
269.1	UST	T10000000039	38D9239	Case Closure Letter for Underground Storage Tanks (USTs), Directorate of Engineering and Housing Area, Presidio of San Francisco, San Francisco County, August 20, 2008			
269.2	UST						
269.3	UST						
269.4	UST						
269.5	UST						
283.1	AST	T10000000041	38D9323	Case Closure Letter for Aboveground Storage Tanks (ASTs), Directorate of Engineering and Housing Area, Presidio of San Francisco, August 20, 2008.			
283.2	AST						
283.3	AST						
Crissy Field Area							
933.1	UST	T10000000047	38D9315	Case Closure Letter for Underground Storage Tanks (USTs), Crissy Field, Presidio of San Francisco, San Francisco County, August 1, 2008.	Crissy Field and Directorate of Engineering and Housing Tank Sites Closure Certificate Report, Presidio of San Francisco, California, September 8, 2006.		
937.3	UST	T10000000049	38D9317				
976.1	UST	T10000000051	38D9237				
979.1	UST	T10000000052	38D9319				
979.2	UST						
979.3	UST	T10000000053	38D9296				
979.7	UST	T10000000055	38D9321				
933.2	AST	T10000000047	38D9315				
933.3	AST						
933.4	AST						
933.5	AST						
976.2	AST						
979.4	AST	T10000000054	38F9320				
979.5	AST						
979.6	AST						
924.1	AST	T10000000044	38D9313	No Further Action, Aboveground Storage Tanks (ASTs), 923/937 Land Use Control Area Tank Sites Closure Report, Presidio of San Francisco, San Francisco County, November 4, 2008.			
924.2	AST						
930.1	AST	T10000000046	38D9208				

Table 5a
SUMMARY OF TANK CLOSURES
 Water Board Order R2-2003-0080
 Presidio of San Francisco
 San Francisco, CA

Tank ID	Tank Type	Geotracker ID	Case ID	Water Board Closure Letter	Trust Closure Request Letter		
Crissy Field Area							
926.1	UST	T10000000045	38D9314	Case Closure Letter for Underground Storage Tanks (USTs), 923/937 Land Use Control Area Tank Sites Closure Report, Presidio of San Francisco, San Francisco County, November 4, 2008.	Crissy Field and Directorate of Engineering and Housing Tank Sites Closure Certificate Report, Presidio of San Francisco, California, September 8, 2006.		
926.2	UST						
926.3	UST						
926.4	UST						
926.5	UST						
930.2	UST	T10000000046	38D9208				
931	UST						
934	UST						
937.1	UST						
937.2	UST						
937.H	UST	T10000000050	38D9318				
Other Areas							
300.1	UST	T0607592220	38D9203	Transmittal of the Closure Letter and Site Summaries for Former Department of Defense (DoD) Underground Storage Tanks at the Presidio of San Francisco Golf Course, San Francisco, CA, August 29, 2000.	Excavation Report for the Golf Course at the Presidio of San Francisco, California, January 4, 2000.		
300.2	UST						
300.3	AST						
742.2	UST	T0607518961	38D9349	Transmittal of Closure Letter and Site Summary for Eight UST Sites, Presidio of San Francisco, San Francisco County, April 2, 2008.	Priority Five Tank Sites Closure Certification Report, Presidio of San Francisco, California, June 18, 2007.		
990	UST						
1600.1	UST	T0607584786	38D9350				
1600.2	UST						
1600.3	UST						
1600.4	UST	SL0607565011	38D9351				
1600.5	UST						
1600.6	UST						
1601.3	AST						
1601.4	AST						
1621.1	UST	T0607565382	38D9352				
1648	UST						
1658	AST						
1660	UST						
314.1	AST						
727.1	AST	SL0607568412	38D9339	No Further Action, Aboveground Storage Tanks (ASTs), Priority Four Tank Sites Closure Certification Report, Presidio of San Francisco, San Francisco County, October 27, 2008.	Priority Four Tank Sites Closure Certification Report, Presidio of San Francisco, California, November 29, 2006.		
727.2	AST						
729.1	AST						
729.2	AST	T100000000170	38D9340				

Table 5a
SUMMARY OF TANK CLOSURES
 Water Board Order R2-2003-0080
 Presidio of San Francisco
 San Francisco, CA

Tank ID	Tank Type	Geotracker ID	Case ID	Water Board Closure Letter Other Areas	Trust Closure Request Letter
731.1	AST	T10000000171	38D9341	No Further Action, Aboveground Storage Tanks (ASTs), Priority Four Tank Sites Closure Certification Report, Presidio of San Francisco, San Francisco County, October 27, 2008.	Priority Four Tank Sites Closure Certification Report, Presidio of San Francisco, California, November 29, 2006.
731.2	AST				
733.2	AST	T10000000173	38D9348		
1185	AST	SL0607573638	38D9335		
1264	AST	T0600192230	38D9213		
720.1	UST	T0609592181	38D9267	Case Closure Letter for Nine Underground Storage Tanks (USTs), East Housing Area, Priority Four Tank Sites Closure Certification Report, Presidio of San Francisco, San Francisco County, December 1, 2008.	
720.2	UST	T0600192182			
732.1	UST	T10000000172	38D9342		
732.2	UST	T10000000172			
751.1	UST	T0607592273	38D9279		
754.1	UST	T0607592276	38D9282		
754.2	UST	T0607592277			
756.1	UST	T0607592279	38D9285		
756.2	UST	T0607592280			
724.1	UST	T0600192184	38D9270	Transmittal of Closure Letter and Site Summary for 16 Underground Storage Tank (UST) Sites, Priority Four Tank Sites Closure Certification Report, Presidio of San Francisco, San Francisco County, January 13, 2009.	
724.2	UST	T0600192185	38D9271		
726.1	UST	T0600192186	38D9272		
726.2	UST	T0600192187	38D9273		
728.1	UST	T0607592188	38D9274		
728.2	UST	T0608592189	38D9275		
757.1	UST	T0607592281	38D9287		
757.2	UST	T0607592282	38D9288		
758.1	UST	T0607592283	38D9289		
758.2	UST	T0608592284	38D9290		
759.1	UST	T0608592285	38D9291		
759.2	UST	T0608592286	38D9292		
760.1	UST	T0608592287	38D9293		
760.2	UST	T0608592288	38D9294		
748/750	UST	T0607592270	38D9276		
749/751	UST	T0607592271	38D9277		
510.1	UST	T0609592170	38D9256	Case Closure Letter for 14 Underground Storage Tanks (USTs), East Housing Area, Priority Four Tank Sites Closure Certification Report dated Nov. 2006, Presidio of San Francisco, San Francisco County, February 2, 2009.	
511.1	UST	T0609592171	38D9257		
512.1	UST	T0609592172	38D9258		
513.1	UST	T0609592173	38D9259		
530.1	UST	T0609592175	38D9261		
531.1	UST	T0609592178	38D9264		
532.1	UST	T0609592179	38D9265		
533.1	UST	T0600192243	38D9226		

Table 5a
SUMMARY OF TANK CLOSURES
 Water Board Order R2-2003-0080
 Presidio of San Francisco
 San Francisco, CA

Tank ID	Tank Type	Geotracker ID	Case ID	Water Board Closure Letter Other Areas	Trust Closure Request Letter
534.1	UST	T0600192244	38D9227	Case Closure Letter for 14 Underground Storage Tanks (USTs), East Housing Area, Priority Four Tank Sites Closure Certification Report dated Nov. 2006, Presidio of San Francisco, San Francisco County, February 2, 2009.	Priority Four Tank Sites Closure Certification Report, Presidio of San Francisco, California, November 29, 2006.
535.1	UST	T0600192245	38D9228		
536.1	UST	T0600192246	38D9229		
537.1	UST	T0600192247	38D9230		
538.1	UST	T0609592176	38D9262		
539.1	UST	T0609592177	38D9263		
7	UST	T0607592221	38D9204	Case Closure Letter for 11 Underground Storage Tanks (USTs), Main Post Area, Priority Four Tank Sites Closure Certification Report dated Nov. 2006, Presidio of San Francisco, San Francisco County, March 23, 2009.	
11	UST	T0600192233	38D9216		
12	UST	T0600192234	38D9217		
14	UST	T10000000169	38D9344		
59	UST	T0608592223	38D9206		
64	UST	T0600192235	38D9218		
100.2	UST	T0600192236	38D9219		
103.2	UST	T0600192237	38D9220		
105.2	UST	T0600192238	38D9221		
130	UST	T0607592267	38D9250		
1029	UST	T0600192227	38D9210		
1647.1	UST	T10000000179	38D9338	Transmittal of Closure Letter and Site Summary for USTs 1647.1 and 1647.2, Golden Gate Fort Point (Area A), Priority Four Sites Closure Certification Report dated Nov. 2006, Presidio of San Francisco, San Francisco County, March 23, 2009	Priority Four Tank Sites Closure Certification Report, Presidio of San Francisco, California, November 29, 2006.
1647.2	UST				
51	UST	T0608592222	38D9205	Transmittal of Closure Letter and Site Summary for Seven USTs, Priority Four Tank Sites Closure Certification Report dated Nov. 2006, Presidio of San Francisco, San Francisco County, May 12, 2009.	
314.2	UST	T0600192240	38D9223		
1100.1	UST	T0600192228	38D9211		
1100.2	UST				
1110.1	UST	T10000000174	38D9336		
1110.2	UST				
1450.1	UST	T10000000176	38D9345		
1233	UST	T0600192229	38D9212	Transmittal of Closure Letter and Site Summary for Six USTs, Fort Scott and Coastal Bluffs Area, Priority Four Tank Sites Closure Certification Report dated Nov.	
1351.1	UST	T10000001000	38D9214		
1398.1	UST	T10000000175	38D9343		
1601.5	UST	T10000000177	38D9346		
1621.2	UST	T10000000178	38D9337		
1621.3	UST			May 12, 2009.	

Table 5a
SUMMARY OF TANK CLOSURES
 Water Board Order R2-2003-0080
 Presidio of San Francisco
 San Francisco, CA

Tank ID	Tank Type	Geotracker ID	Case ID	Water Board Closure Letter Other Areas	Trust Closure Request Letter
920.1	UST	T10000000730	38D9358	Transmittal of Closure Letter and Site Closure Summary for Building 920 Area USTs, Presidio of San Francisco, San Francisco County, May 7, 2010.	Request for Closure and Transmittal of Building 920 Area Completion Report, Presidio of San Francisco, California, August 20, 2008.
920.2	UST				
1794	UST	T10000001302	38D9201	Transmittal of Closure Letter and Site Closure Summary for UST 1794, Presidio of San Francisco, San Francisco County, June 9, 2010.	Closure Request for UST 1794, Presidio of San Francisco, July 20, 2009.
1351.2	UST	T10000001518	38D9202	Transmittal of Closure Letter and Site Closure Summary for 7 USTs, 2 ASTs and one hydraulic hoist in the Fort Scott and Presidio Health Services Hospital Area, Presidio of San Francisco, San Francisco County, July 30, 2010.	Closure Request for Selected Tanks in Fort Scott and Presidio Health Services Hospital Area, Presidio of San Francisco, California, June 9, 2009.
1399.1	UST	T10000001519	38D9207		
1399.2	UST				
1399.3	AST				
1399.4	UST				
1802.1	UST	T10000001520	38D9215		
1802.2	UST				
1802.3	UST				
1802.4	UST				
1806	UST	T10000001521	38D9224		
1221.5	UST	T0609592298	38D9304	Closure Approval for eight UST Sites, Presidio of San Francisco, San Francisco County, November 9, 2010.	Submittal of Information for Identified Geotracker Sites and Closure Request for Selected Tanks, Presidio of San Francisco, California, April 28, 2009.
1362	UST	T0609592301	38D9307		
645.1	UST	T10000001510	38D9238	No Further Action for Seven UST Sites, Presidio of San Francisco, San Francisco County, December 20, 2010.	Closure Request for Selected Tanks at Various Locations, Presidio of San Francisco, California, August 7, 2009.
650.1	UST	T10000001511	38D9269		
650.2	AST				
662.3	UST	T10000001512	38D9278		Addendum to Submittal of Information for Identified Geotracker Sites and Closure Request for Selected Tanks, Presidio of San Francisco, California.
662.4	UST				
751.2	UST	T10000001513	38D9280		
1100	UST	T10000001514	38D9281		
1228	UST	T10000001516	38D9297		
1801	UST	T10000001517	38D9299		
336	UST	T10000002821	38D9225	No Further Action for Nine Infantry Terrace Tank Sites, Presidio of San Francisco, San Francisco County, March 1, 2011.	Closure Request for Nine Infantry Terrace Tanks, Presidio of San Francisco, California, October 15, 2010. (See Note a)
337	UST	T0607592268	38D9251		
338.2	UST				
340	UST	T10000002825	38D9301		

Table 5a
SUMMARY OF TANK CLOSURES
 Water Board Order R2-2003-0080
 Presidio of San Francisco
 San Francisco, CA

Tank ID	Tank Type	Geotracker ID	Case ID	Water Board Closure Letter Other Areas	Trust Closure Request Letter
1750.2	UST	T0609592300	38D9306	No Further Action for UST 1750.2, Presidio of San Francisco, San Francisco, San Francisco County, June 20, 2012.	Closure Request for Selected Tanks at Various Locations, Presidio of San Francisco, California, August 7, 2009. Addendum to Submittal of Information for Identified Geotracker Sites and Closure Request for Selected Tanks, Presidio of San Francisco, California, January 10, 2011.
35.5	UST	T10000002955	38D9302	No Further Action for USTs 35.5, 69.1, and 1807,	Request for Closure for Four Tanks (USTs 35.5, 69.1, 603, and 1807) and Submittal of Information for Geotracker, Presidio of San Francisco, California, January 6, 2011.
69.1	UST	T10000002956	38D9303	Presidio of San Francisco, San Francisco, San Francisco County, July 12, 2012.	
1807	UST	T10000002954	38D9308	No Further Action for UST 603, Presidio of San Francisco, San Francisco, San Francisco County, September 6, 2012.	Request for No Further Action, UST 920.3, Presidio of San Francisco, California, February 23, 2011.
603	UST	T0609592180	38D9266	No Further Action for UST 920.3, Presidio of San Francisco, San Francisco, San Francisco County, January 30, 2013.	
920.3	UST	T10000003421	None assigned	No Further Action for UST 1802.5, Presidio of San Francisco, San Francisco, San Francisco County, March 11, 2013.	Underground Storage Tank 1802.5 Closure Report, Building 1802 Underground Storage Tank Removal (ERRG), April 2012.
1802.5	UST	T10000004542	None assigned	No Further Action for UST 205.1 and 3 Non-Fuel Tanks Discovered Near Former Building 206, Presidio of San Francisco, San Francisco County, May 8, 2014.	Follow-up to May 30, 2013 UST 205.1 Field Report Request for Tank Closure for Tank 205.1 and for No Further Action Regarding Three Non-fuel Tanks Discovered Near Former Building 206, Presidio of San Francisco, California, July 25, 2013.
205.1	UST	T10000005852	None assigned		

Abbreviations:

AST	Above ground storage tank
UST	Underground storage tank
Water Board	Regional Water Quality Control Board

Notes:

(a) The Infantry Terrace Tanks included both mini-CAP tanks and general tanks; therefore, these tanks are listed in their respective tank grouping.

Table 5b
SUMMARY OF NO FURTHER ACTION FOR UNSUBSTANTIATED OR HISTORICALLY REMOVED TANKS
 Water Board Order R2-2003-0080
 Presidio of San Francisco
 San Francisco, CA

Submittal #1														
Tank Request:			Request for No Further Action (NFA), Priority 8 Tanks, Submittal No. 1, Presidio of San Francisco, California, September 13, 2010											
Water Board NFA letter:			No Further Action for Priority 8 Tanks, Submittal No. 1, Presidio of San Francisco, San Francisco County, January 28, 2013											
	4	104.4	511.2	543	550.1	652	953	963	1265.1	1270.3	1276.1	1295	1304.2	1322.2
	21	105.3	512.2	544.1	550.2	680	954	964	1265.2	1270.4	1276.2	1296	1306	1324.1
	38.3	105.4	513.2	544.2	551.1	715	955	1060	1266.1	1272.1	1277.1	1297	1308.1	1324.2
	45	125	514.2	545	551.2	716	956	1064	1266.2	1272.2	1277.2	1298	1308.2	1326.1
	65	126	540.1	546.1	601.1	717	957	1261.1	1266.3	1273.1	1287	1300.1	1310.1	1326.2
	101.3	127	540.2	546.2	601.2	719	958	1261.2	1266.4	1273.2	1289	1300.2	1310.2	1328.1
	101.4	128	541.1	547	622	721	959	1262.1	1268.1	1274.1	1290	1301	1314	1328.2
	103.3	129	541.2	548.1	624	723	960	1262.2	1268.2	1274.2	1291	1302	1320.1	1330
	103.4	341.2	542.1	548.2	642.3	725	961	1263.1	1270.1	1275.1	1293	1303	1320.2	1334
	104.3	510.2	542.2	549	644	952	962	1263.2	1270.2	1275.2	1294	1304.1	1322.1	1337
Submittal #2														
Tank Request:			Request for No Further Action (NFA), Priority 8, Area B Tanks, Submittal No. 2, Presidio of San Francisco, California, January 4, 2011											
Water Board NFA letter:			No Further Action for Priority 8 Tanks, Submittal No. 2, Presidio of San Francisco, San Francisco County, April 8, 2013											
	1	41	135	210.2	304	626	929.1	1202	1213.2	1226.1	1339	1399.6	1800	--
	13	63	136	217.1	572	628	938.1	1203	1214.1	1226.2	1355	1437	1818	--
	35.2	78	137	217.2	610.1	636	938.2	1204	1214.3	1227	1356	1750.1	1753/1754	--
	35.3	106	140	217.3	610.2	638.2	965.1	1205	1216.1	1229	1357	1750.3	GT39	--
	35.4	122	158	217.4	616	649	965.2	1206	1217.1	1230	1359.1	1773.1	M30	--
	35.6	123	206	227	619	653	1168	1207	1218	1235	1359.2	1773.2	--	--
	40	124	207.4	238	621	733.1	1201	1208	1224	1244	1365	1774	--	--
Submittal #3														
Tank Request:			Request for No Further Action (NFA), Priority 8, Area A Tanks, Submittal No. 3, Presidio of San Francisco, California, February 8, 2011											
Water Board NFA letter:			No Further Action for Priority 8 Tanks, Submittal No. 3, Presidio of San Francisco, San Francisco County, June 20, 2013											
	31	102.3	102.4	250	252	253.1	253.2	996	1625	--	--	--	--	--

Abbreviations:

NFA No Further Action

Water Board Regional Water Quality Control Board

Table 6
SUMMARY OF SITE STATUS REPORTS

Water Board Order R2-2003-0080
Presidio of San Francisco
San Francisco, CA

Date of Submittal	Document
January 15, 2004	<i>Site Status Report #1, Site Cleanup Requirements; RWQCB Order R2-2003-0080, Presidio of San Francisco – San Francisco, California.</i>
July 15, 2004	<i>Site Status Report #2, Site Cleanup Requirements; RWQCB Order R2-2003-0080, Presidio of San Francisco – San Francisco, California.</i>
January 15, 2005	<i>Site Status Report #3, Site Cleanup Requirements; RWQCB Order R2-2003-0080, Presidio of San Francisco – San Francisco, California.</i>
July 15, 2005	<i>Site Status Report #4, Site Cleanup Requirements; RWQCB Order R2-2003-0080, Presidio of San Francisco – San Francisco, California.</i>
January 17, 2006	<i>Site Status Report #5, Site Cleanup Requirements; RWQCB Order R2-2003-0080, Presidio of San Francisco – San Francisco, California.</i>
July 17, 2006	<i>Site Status Report #6, Site Cleanup Requirements; RWQCB Order R2-2003-0080, Presidio of San Francisco – San Francisco, California.</i>
January 19, 2007	<i>Site Status Report #7, Site Cleanup Requirements; RWQCB Order R2-2003-0080, Presidio of San Francisco – San Francisco, California.</i>
July 20, 2007	<i>Site Status Report #8, Site Cleanup Requirements; RWQCB Order R2-2003-0080, Presidio of San Francisco – San Francisco, California.</i>
January 18, 2008	<i>Site Status Report #9, Site Cleanup Requirements; RWQCB Order R2-2003-0080, Presidio of San Francisco – San Francisco, California.</i>

Note: For Site Status Reports after January 2008, see Quarterly Reports referenced in Table 2 and listed in Table 10.

Table 7

SUMMARY OF SITE-WIDE GROUNDWATER/SURFACE WATER SEMI-ANNUAL MONITORING REPORTS

Water Board Order R2-2003-0080

Presidio of San Francisco

San Francisco, CA

Date Submitted	Document Title
October 14, 2003	<i>Semi-Annual Groundwater Monitoring Report, First and Second Quarters 2003</i>
April 1, 2004	<i>Semi-Annual Groundwater Monitoring Report, Third and Fourth Quarters 2003</i>
October 13, 2004	<i>Semi-Annual Groundwater Monitoring Report, First and Second Quarters 2004</i>
April 15, 2005	<i>Semi-Annual Groundwater Monitoring Report, Third and Fourth Quarters 2004</i>
October 11, 2005	<i>Semi-Annual Groundwater Monitoring Report, First and Second Quarters 2005</i>
April 14, 2006	<i>Semi-Annual Groundwater Monitoring Report, Third and Fourth Quarters 2005</i>
October 13, 2006	<i>Semi-Annual Groundwater Monitoring Report, First and Second Quarters 2006</i>
April 11, 2007	<i>Semi-Annual Groundwater Monitoring Report, Third and Fourth Quarters 2006</i>
October 15, 2007	<i>Semi-Annual Groundwater Monitoring Report, First and Second Quarters 2007</i>
April 10, 2008	<i>Semi-Annual Groundwater Monitoring Report, Third and Fourth Quarters 2007</i>
October 15, 2008	<i>Semi-Annual Groundwater Monitoring Report, First and Second Quarters 2008</i>
April 9, 2009	<i>Semi-Annual Groundwater Monitoring Report, Third and Fourth Quarters 2008</i>
October 8, 2009	<i>Semi-Annual Groundwater Monitoring Report, First and Second Quarters 2009</i>
March 30, 2010	<i>Semi-Annual Groundwater Monitoring Report, Third and Fourth Quarters 2009</i>
October 12, 2010	<i>Semi-Annual Groundwater Monitoring Report, First and Second Quarters 2010</i>
April 6, 2011	<i>Semi-Annual Groundwater Monitoring Report, Third and Fourth Quarters 2010</i>
October 18, 2011	<i>Semi-Annual Groundwater Monitoring Report, First and Second Quarters 2011</i>
April 3, 2012	<i>Semi-Annual Groundwater Monitoring Report, Third and Fourth Quarters 2011</i>
October 15, 2012	<i>Semi-Annual Groundwater Monitoring Report, First and Second Quarters 2012</i>
April 11, 2013	<i>Semi-Annual Groundwater Monitoring Report, Third and Fourth Quarters 2012</i>
October 15, 2013	<i>Semi-Annual Groundwater Monitoring Report, First and Second Quarters 2013</i>
April 8, 2014	<i>Semi-Annual Groundwater Monitoring Report, Third and Fourth Quarters 2013</i>

Table 8
SUMMARY OF FUEL DISTRIBUTION SYSTEM CLOSURE DOCUMENTATION

Water Board Order R2-2003-0080
 Presidio of San Francisco
 San Francisco, CA

Site	Document
FDS Phase I	Erler & Kalinowski, Inc., January 27, 2006. <i>Request for Closure Certification, Fuel Distribution System, Draft FDS Closure Certification Report – Phase I, Presidio of San Francisco, California.</i>
	Erler & Kalinowski, Inc., October 3, 2008. <i>Request for No Further Action, Addendum to the Fuel Distribution System, FDS Closure Certification Report – Phase I, Presidio of San Francisco, California.</i>
FDS Phase II Area B	Erler & Kalinowski, Inc., February 18, 2009. <i>Request for Closure and Transmittal of the Former Fuel Distribution System Area B Phases II and III Field Sampling Report and Phase II Closure Report, Presidio of San Francisco – San Francisco, California.</i>
	Erler & Kalinowski, Inc., March 7, 2011. <i>Revised Closure Request for 29 Former Fuel Distribution System Sections, Phase II, Area B, Presidio of San Francisco, California.</i>
FDS Phase II Area A	Erler & Kalinowski, Inc., March 13, 2009. <i>Request for Closure and Transmittal of the Former Fuel Distribution System Area A Phase II Field Sampling Report and Phase II Closure Report, Presidio of San Francisco – San Francisco, California.</i>
	Erler & Kalinowski, Inc., March 16, 2011. <i>Revised Closure Request for Four Former Area A Fuel Distribution System Sections, Phase II, Presidio of San Francisco, California.</i>
FDS Phase III Area B	Erler & Kalinowski, Inc., October 7, 2009. <i>Transmittal and Request for Closure, Former Fuel Distribution System Area B Phase III Field Sampling Report, Presidio of San Francisco – San Francisco, California.</i>
	Erler & Kalinowski, Inc., March 8, 2011. <i>Revised Closure Request for Four Former Fuel Distribution System Sections, Phase III, Area B, Presidio of San Francisco, California.</i>

Table 9
STATUS SUMMARY OF FUEL DISTRIBUTION SYSTEM SECTION SUMMARY BY CLOSURE GROUP

Water Board Order R2-2003-0080
 Presidio of San Francisco
 San Francisco, CA

FDS Closure Phase I	FDS Closure Phase II (Area B)	FDS Closure Phase II (Area A)	FDS Closure ^(a) Phase III (Area B)
(Closed 9/16/09)	<ul style="list-style-type: none"> • Initial Closure Request Submitted 2/18/09 • Revised Closure Request Submitted 3/7/11 	<ul style="list-style-type: none"> • Initial Closure Request Submitted 3/13/09 • Revised Closure Request Submitted 3/16/11 	<ul style="list-style-type: none"> • Initial Closure Request Submitted 10/7/09 • Revised Closure Request Submitted 3/8/11
27 Sections -- all closed	29 Sections -- all closed	4 Sections -- all closed	4 Sections -- all closed
Area 5 Section A	BR1-1 (NFA 11/5/2013)	BR9-1 (NFA 3/13/2014)	BR5-2 (NFA 4/7/14)
Area 5 Section B	BR1-2 (NFA 11/5/2013)	CF-4 (Commissary / PX CAP) (NFA 3/13/2014)	BR10-1 (NFA 4/7/14)
Area 5 Section C	BR2-2 (NFA 2/10/2014)	CF-12 (Commissary / PX CAP) (NFA 3/13/2014)	MT-4 (NFA 4/2/2014)
Area 5 Section D	BR3-1 (NFA 11/5/2013)		MT-9 (NFA 4/2/2014)
Area 6 Section A	BR3-2 (NFA 2/10/2014)		
Area 6 Section B	BR5-3 (NFA 11/19/2013)	MT-2 (NFA 3/13/2014)	
BR2-1	BR6-1 (NFA 11/19/2013)		
BR2-3	BR6-3 (NFA 03/10/2014)		
BR3-3	BR6-5 (Commissary / PX CAP) (NFA 03/10/2014)		
BR3-4			
BR3-5	BR7-1 (NFA 10/2/2013)		
BR4-1	BR7-2 (NFA 11/19/2013)		
BR6-2	BR8-1 (1065 CAP) (NFA 03/10/2014)		
BR6-4	BR10-2 (NFA 12/2/2013)		
BR11-1	BR10-3 (NFA 12/2/2013)		
BR14-1	BR12-1 (NFA 2/10/2014)		
CF-1	BR13-1 (NFA 12/2/2013)		
CF-2	BR13-2 (NFA 3/6/2014)		
CF-3	BR15-1 (NFA 12/19/13)		
CF-6	BR16-1 (NFA 12/19/13)		
CF-7	MT-3 (NFA 2/13/2014)		
CF-8	MT-5 (NFA 1/15/2014)		
CF-9	MT-10 (NFA 10/2/2013)		
CF-10	MT-11 (NFA 10/2/2013)		
CF-11	MT-12 (NFA 1/15/2014)		
MT-1	MT-13 (NFA 2/13/2014)		
MT-8	MT-14 (NFA 2/13/2014) MT-15 (NFA 3/6/2014) MT-16 (NFA 1/15/2014) MT-17 (NFA 3/6/2014)		

Notes:

(a) FDS Sections MT-6 and MT-7 are included in the 1349 Corrective Action Plan Closure Request. **These 2 sections received NFA 2/11/2013.**
 (b) See page 2 for references.

Table 9
STATUS SUMMARY OF FUEL DISTRIBUTION SYSTEM SECTION SUMMARY BY CLOSURE GROUP

Water Board Order R2-2003-0080
Presidio of San Francisco
San Francisco, CA

Water Board Closure Letter References:

- (1) **NFA 9/16/2009:** No Further Action, Fuel Distribution System, FDS Closure Certification Report Phase I, Presidio of San Francisco, San Francisco County.
- (2) **NFA 2/11/2013:** No Further Action for Building 1349 Study Area and FDS Sections MT-6 and MT-7, Presidio of San Francisco, San Francisco, San Francisco County.
- (2) **NFA 10/2/2013:** No Further Action for Fuel Distribution System (FDS) Sections BR7-1, MT-10 and MT-11, Presidio of San Francisco, San Francisco County.
- (3) **NFA 11/5/2013:** No Further Action for Fuel Distribution System (FDS) Sections BR1-1, BR1-2 and BR3-1, Presidio of San Francisco, San Francisco County.
- (4) **NFA 11/19/2013:** No Further Action for Fuel Distribution System (FDS) Sections BR5-3, BR6-1 and BR7-2, Presidio of San Francisco, San Francisco County.
- (5) **NFA 12/2/2013:** No Further Action for Fuel Distribution System (FDS) Sections BR10-2, BR10-3 and BR13-1, Presidio of San Francisco, San Francisco County.
- (6) **NFA 12/19/2013:** No Further Action for Fuel Distribution System (FDS) Sections BR15-1 and BR16-1, Presidio of San Francisco, San Francisco County.
- (7) **NFA 1/15/2014:** No Further Action for Fuel Distribution System (FDS) Sections MT-5, MT-12 and MT-16, Presidio of San Francisco, San Francisco County.
- (8) **NFA 2/10/2014:** No Further Action for Fuel Distribution System (FDS) Sections BR2-2, BR3-2 and BR12-1, Presidio of San Francisco, San Francisco County.
- (9) **NFA 2/13/2014:** No Further Action for Fuel Distribution System (FDS) Sections MT-3, MT-13 and MT-14, Presidio of San Francisco, San Francisco County.
- (10) **NFA 3/6/2014:** No Further Action for Fuel Distribution System (FDS) Sections MT-15, MT-17 and BR13-2, Presidio of San Francisco, San Francisco County.
- (11) **NFA 3/10/2014:** No Further Action for Fuel Distribution System (FDS) Sections BR6-3, BR6-5, and BR8-1, Presidio of San Francisco, San Francisco County.
- (12) **NFA 3/13/2014:** No Further Action for Fuel Distribution System (FDS) Sections BR9-1, CF-4, CF-12, MT-2, Presidio of San Francisco, San Francisco County.
- (13) **NFA 4/2/2014:** No Further Action for Fuel Distribution System (FDS) Sections MT-4 and MT-9, Presidio of San Francisco, San Francisco County.
- (14) **NFA 4/7/2014:** No Further Action for Fuel Distribution System (FDS) Sections BR5-2 and BR10-1, Presidio of San Francisco, San Francisco County.

Table 10
REPORTS EVALUATING THE EFFECTIVENESS OF APPROVED CAPS AT GROUNDWATER-IMPACTED SITES

Water Board Order R2-2003-0080
 Presidio of San Francisco
 San Francisco, CA

Site	Documents
Building 207/231	Water Board, April 28, 2014. <i>No Further Action for the Building 207/231 Area, Presidio of San Francisco, San Francisco County.</i>
	AMEC, February 7, 2014. <i>Evaluation of Post-Remediation Groundwater Monitoring Results, Building 207/231 Area, Presidio of San Francisco.</i>
	AMEC, January 15, 2014. <i>Construction Completion Report, Building 207/231 Area, Presidio of San Francisco, San Francisco, California.</i>
Commissary/PX Area	Water Board, July 13, 2009. <i>No Further Action, Commissary/PX Study Area, Presidio of San Francisco, San Francisco County.</i>
	AMEC, November 24, 2008. <i>Corrective Action Plan Implementation and Closure Report, Commissary/PX Study Area.</i>
Building 1065 Area	Water Board, March 29, 2012. <i>No Further Action for the Building 1065 Area, Presidio of San Francisco, San Francisco, San Francisco County.</i>
	MACTEC, April 2011. <i>Revised Closure Request, Building 1065 Area, Presidio of San Francisco, San Francisco, California.</i>
	MACTEC, May 2010. <i>Request for Closure and Transmittal of Groundwater Evaluation, Building 1065 CAP Area, Presidio of San Francisco, California.</i>
	MACTEC, March 2009. <i>Construction Completion Report, Corrective Action Plan Implementation, Bldg 1065 Area.</i>
Building 1349	Water Board, February 11, 2013. <i>No Further Action for Building 1349 Study Area and FDS Sections MT-6 and MT-7, Presidio of San Francisco, San Francisco, San Francisco County.</i>
	Presidio Trust, October 5, 2012. <i>Groundwater Assessment and Request to Terminate Groundwater Monitoring of Well 1349MW100, Corrective Action Plan Area, Building 1349 Presidio of San Francisco, San Francisco, California.</i>
	Arcadis, March 23, 2011. <i>Corrective Action Implementation Report for the Building 1349 Study Area.</i>
Building 637 Area	Erler & Kalinowski, Inc., May 1, 2014. <i>Corrective Action Completion Report, Building 637 Area, Presidio of San Francisco.</i>
	Water Board, July 7, 2008. <i>No Further Action, Building 637 Area, Presidio of San Francisco.</i>
	Erler & Kalinowski, Inc., March 2004. <i>Building 637 Area Completion Report, Presidio of San Francisco, California.</i>

Table 11
SUMMARY OF DOCUMENTS ASSOCIATED WITH DELAYED COMPLIANCE AND REMEDIATION TIME SCHEDULE

Water Board Order R2-2003-0080
 Presidio of San Francisco
 San Francisco, CA

Date of Submittal	Document Title
December 19, 2003	<i>Delayed Compliance, Request for Time Extension for Task on Presidio Petroleum Schedule, Site Cleanup Requirements; RWQCB Order R2-2003-0080, Presidio of San Francisco - San Francisco, California.</i>
March 23, 2004	<i>Delayed Compliance, Request for Time Extension for Task on Presidio Petroleum Schedule, Blg 1065 Phase II Interim Action, Site Cleanup Requirements; RWQCB Order R2-2003-0080, Presidio of San Francisco - San Francisco, California.</i>
April 22, 2004	<i>Delayed Compliance, Request for Time Extension for Task on Presidio Petroleum Schedule, Draft Commissary PX Corrective Action Plan, Site Cleanup Requirements; RWQCB Order R2-2003-0080, Presidio of San Francisco - San Francisco, California.</i>
January 31, 2005	<i>Delayed Compliance, Request for Time Extension: Presidio Petroleum Schedule, Draft Building 1349 Area Corrective Action Plan, Site Cleanup Requirements; RWQCB Order R2-2003-0080, Presidio of San Francisco – San Francisco, California.</i>
August 15, 2005	<i>Delayed Compliance, Request for Time Extension on Construction Start Date, Commissary PX Site, RWQCB Order R2-2003-0080, Presidio of San Francisco - San Francisco, California.</i>

